

Appendix G



Tim Williams

Great blue heron

Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Assessment for Elizabeth Hartwell Mason Neck and Featherstone National Wildlife Refuges

- Introduction
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- Service Responses to Comments by Subject

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Introduction

In December 2010, we completed the Elizabeth Hartwell Mason Neck and Featherstone National Wildlife Refuges Draft Comprehensive Conservation Plan and Environmental Assessment (draft CCP/EA). The draft CCP/EA outlines three alternatives for managing Mason Neck National Wildlife Refuge (Mason Neck Refuge) and two alternatives for managing Featherstone Refuge over the next 15 years. Alternative B is identified as the “Service-preferred alternative” for each refuge.

We released the draft CCP/EA for 49 days of public review and comment from January 5 to February 22, 2011. We evaluated all the letters and e-mails sent to us during that comment period, along with comments recorded at three public meetings. Two of those meetings were held in Woodbridge, Virginia, including an afternoon and evening session on February 2, 2011. The third meeting was held in Lorton, Virginia on February 3 in the evening. This document summarizes all of the substantive comments received and provides our responses to them.

Based on our analysis in the draft CCP/EA and our evaluation of comments received on that document, we modified both Service-preferred alternatives (alternative B for both refuges) as originally presented in the draft CCP/EA and recommend these modified versions to our Acting Regional Director for implementation. The final CCP represents the modified alternative B for both refuges. Our modifications include one addition and four clarifications of the management actions from the draft CCP/EA alternatives. We have determined that none of these changes warrants our publishing a revised or amended draft CCP/EA before submitting the final CCP to our Acting Regional Director for approval.

Below we list the change (item #1) and clarifications (items #2, #3, #4, and #5) we made in the final CCP.

1. Upon CCP approval, we propose to allow non-motorized boat landings at one designated area of Featherstone Refuge’s shoreline to facilitate wildlife observation and nature photography. The designated landing site is a portion of tidal beach on Farm Creek (refer to map 4.3 in the final CCP) and corresponds with the proposed location of the southernmost observation deck and fishing platform that we presented in the draft CCP/EA (map 3.3 in the draft CCP/EA). Visitors accessing the refuge at this location by non-motorized boat would be allowed to walk approximately 0.4 miles along an existing footpath (indicated on map 4.3 in the final CCP). Boaters would be confined to this section of footpath until the rest of the refuge is officially open to public use, as described in the draft CCP/EA. No special infrastructure would be constructed to facilitate non-motorized boat access. We predict no short- or long-term impacts to resources given
 - our expectation that less than 200 boat landings per year would occur;
 - the landing site location is primarily on tidal sandy beach which is a dynamic, shifting substrate and has very little vegetation or soils that would be impacted;
 - none of the vegetation in the area is of conservation concern, and people would be required to stay on the existing footpath to minimize additional off-trail impacts; and
 - our current knowledge of wildlife inhabiting the area indicates no disturbances to nesting or breeding wildlife would occur.

We would monitor to see if any of these conditions change, or unanticipated impacts are occurring, and would adapt management as warranted. We would also conduct regular outreach and enforcement of refuge regulations to insure minimal to no impacts results.

The proposal to allow non-motorized boat landings on Featherstone Refuge is included in the final CCP, chapter 4 for Featherstone Refuge, goal 2, objective 2.4 “Wildlife Observation and Photography,” and in appendix B, the final compatibility determination for “Wildlife Observation, Photography, Environmental Education, and Interpretation.”

2. For Mason Neck Refuge, we clarify our proposal to open the refuge to a youth turkey hunt since some respondents thought there were inconsistencies in the way we described this youth hunt when comparing text between draft CCP/EA chapters 3 and 4. Our proposal assumes a maximum of five youth per day would hunt on refuge lands over a 3-day period. The three hunt days might not be consecutive. Each hunt day would be from sunrise to noontime and all 3 days would occur during the State’s spring turkey hunting season. Only gobblers would be harvested and only by shotgun. Youth hunt areas would be in pre-designated, well-distributed areas that are otherwise closed to the public. We do not propose any disruption of access for other refuge visitors. Hunters would be required to complete data forms to document their observations and success. This documentation would allow us to evaluate the program periodically and make changes as warranted. We would work with the Virginia Department of Game and Inland Fisheries (VDGIF), the National Wild Turkey Federation, and other partners to design and implement the hunt once we have additional staff in place. According to VDGIF and their results from other hunt areas, less than 50 percent of youth turkey hunters are successful. This statistic, coupled with the fact that only males would be taken in the spring after breeding, causes us to predict that there would be no short-term or long-term impact, or cumulative effect, on the viability of the local turkey population. This conclusion was substantiated in discussions with VDGIF wildlife officers (VDGIF pers. com. 2011).

The final CCP includes these details in chapter 4 for Mason Neck Refuge, goal 3, in the rationale for objective 3.2 “Youth Turkey Hunting,” and in appendix B, the compatibility determination for “Hunting.” Also, see our response below under **“Hunting – Youth Turkey Hunt.”**

3. For both refuges, we clarify our proposal on deer hunting. For Mason Neck Refuge, in addition to the shotgun season we currently provide, our proposal is to also open the refuge to an archery deer hunt. Similar to the shotgun season, the archery hunt would be cooperatively managed with VDGIF and Mason Neck State Park, and would be consistent with State regulations. With additional staff in place, and with partner support, we would also consider changing the length of the annual refuge shotgun season, the number of hunters, and/or their distribution when declining forest health conditions warrant an increased deer harvest. If we determine major changes to the shotgun hunting program are justified, we would complete all administrative requirements to formally make the changes. On Featherstone Refuge, we do not currently have a hunt program on the refuge, nor do we have a specific proposal to review and analyze yet. Once additional staff are in place, we would identify and analyze a detailed hunt proposal, and include additional public involvement during that evaluation, before making a decision on a specific program.

The final CCP includes these details in chapter 4 for Mason Neck Refuge, goal 3, in the rationale for objective 3.1 “Deer Hunting,” and in appendix B, the compatibility determination for “Hunting.” In chapter 4 for Featherstone Refuge, goal 2, objective 2.2 “Hunting,” we explain our plans to evaluate hunting on this refuge at a later date. Also, see our response below under **“Hunting – Deer.”**

4. For both refuges, we clarify our proposal on waterfowl hunting. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, goal 3, objective 3.3, we state that waterfowl hunting in refuge waters is not compatible with refuge purposes due to concerns about disturbing breeding and wintering bald eagles and wintering waterfowl. As noted above in our discussion on deer hunting, in the draft CCP/EA, chapter 3 for Featherstone Refuge, goal 2, objective 2.2 “Hunting,” our proposal is to conduct a more detailed evaluation of possible hunting alternatives when we have additional staff in place, and include additional public involvement during that evaluation, before making a decision on a specific program.

We recognize and fully support waterfowl hunting as a traditional and legitimate activity in the region. Under objective 3.3 for Mason Neck Refuge, we would plan to fully support VDGIF in ensuring that the public

continues to have quality waterfowl hunting opportunities in State waters near the refuge. As part of that cooperation, we identify a strategy under objective 3.3 to work with VDGIF to evaluate the use of temporary floating blinds to replace fixed blinds as a way to expand opportunities, but otherwise we have no jurisdiction or intent to mandate this.

The final CCP includes these details in chapter 4 for Mason Neck Refuge, goal 3, in the rationale for objective 3.3 “Waterfowl Hunting.” In chapter 4 for Featherstone Refuge, goal 2, objective 2.2 “Hunting,” we explain our plans to evaluate hunting on this refuge at a later date. Also, see our response below under **“Hunting – Waterfowl and Hunting Blinds.”**

5. For both refuges, we clarify our intent with regards to shoreline protection measures. In the final CCP Chapter 4, for Mason Neck Refuge, goal 2, objective 2.3 “Shoreline Protection,” we describe our proposal to continue working with partners to maintain and evaluate the existing breakwater structures. We also state that our proposal includes working with experts to conduct a risk assessment to identify and prioritize other potential shoreline restoration areas and identify viable protection methods. Our intent is the same for Featherstone Refuge’s shoreline, as described in the final CCP chapter 4, for Featherstone Refuge, goal 1, objective 1.2 “Shoreline Protection, Wetlands, and Water Quality.”

We acknowledge that our proposal is vague as it relates to specific protection methods. This is intentional as we have no particular design in mind and recognize that we need to get additional expertise to conduct the risk assessment and to evaluate potential viable protection methods. While some respondents suggested possible tools and techniques, prior to discussing options with experts, we do not want to limit ourselves to any one method. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under the heading “Conducting Additional NEPA Analysis” we state that before a decision is reached on the design, and before any actions are taken on the ground, we would conduct additional or supplemental National Environmental Policy Act (NEPA) analysis. Also, see our response below under **“Shoreline Protection.”**

For either refuge, our Acting Regional Director decides between essentially three choices. The Acting Regional Director may select

- our modified alternative B for implementation;
- one of the other alternatives analyzed in the draft CCP/EA; or
- combine actions from among the alternatives in his decision.

The Acting Regional Director will also determine whether a Finding of No Significant Impact (FONSI) is justified prior to finalizing the decision. The decision will be made after

- reviewing all the comments received on the draft CCP/EA, and our responses to those comments; and
- affirming that the CCP actions support the purpose and need for the CCP, the purposes for which the refuges were established, help fulfill the mission of the Refuge System, comply with all legal and policy mandates, and work best toward achieving each refuge’s vision and goals.

Concurrent with release of an approved CCP, we will publish a notice of the availability in the *Federal Register*. That notice will complete the planning phase of the CCP process, and we can begin implementing the plan.

Summary of Comments Received

Given our interest in an objective analysis of the comments we received, we enlisted the U.S. Forest Service’s Recreation Solutions Enterprise Team (Forest Service) in compiling a database that would identify and code specific issues and concerns. That team has particular expertise in providing unbiased analyses of public comments on major proposals by Federal land management agencies, a process called “content analysis.” The team evaluated and coded all of the comments we received, including all letters, e-mails, and comments recorded at public meetings. Our responses below follow the subject headings in their coding structure. Their full report is available online at: http://www.fws.gov/northeast/planning/MasonNeck_Featherstone/ccphome.html (accessed August 2011).

During the comment period, we received 79 responses, both written and oral. These responses represent 85 different signatures and 353 individual comments.

We gathered oral comments at the following public meetings attended by a total of 65 people:

- February 2, 2011: Potomac Community Library, Woodbridge VA (two sessions; one afternoon, one evening)
- February 3, 2011: Gunston Elementary School, Lorton, VA

We received a variety of letters from local, State, and Federal Governmental agencies and entities, including the following:

- Virginia Council on Indians
- Virginia Department of Historic Resources (VDHR)
- Virginia Department of Game and Inland Fisheries (VDGIF)
- Representative Gerald E. Connolly, Congress of the United States, House of Representatives
- Fairfax County Stormwater Planning Division (SWPD)
- Potomac Heritage National Scenic Trail – National Park Service
- Prince William County, Woodbridge District Supervisor
- Fairfax County Department of Planning and Zoning

We also received a consolidated letter (dated February 16, 2011) compiled by the Virginia Department of Environmental Quality (VDEQ) that included comments from the seven State and county agencies listed below (several agencies submitted both individual comments and comments in the consolidated letter). We either refer to that letter herein as the “VDEQ” letter, or refer to respective agency comments.

- Virginia Department of Environmental Quality
- Virginia Department of Agriculture and Consumer Services (VDACS)
- Virginia Department of Conservation and Recreation (VDCR)
- Virginia Department of Health (VDH)
- Virginia Department of Historic Resources
- Fairfax County
- Prince William County

We also received comments signed by representatives from the following organizations:

- Friends of Potomac River Refuges
- Prince William Conservation Alliance
- Northern Virginia Chapter of Delta Waterfowl
- Elizabeth Hartwell Environmental Education Fund
- Northern Virginia Bird Club
- Virginia Chapter of the Sierra Club
- Virginia Conservation Associate Audubon Naturalist Society
- Audubon Society of Northern Virginia (ASNV)
- Virginia Native Plant Society (VNPS)
- Prince William Wildflower Society

In the discussions below, we address every substantive comment received. Substantive comments are those that suggest the analysis is flawed in a specific way. Generally substantive comments

- challenge the accuracy of information presented;
- challenge the adequacy, methodology, or assumptions of the environmental or social analysis and supporting rationale;

- present new information relevant to the analysis; or
- present reasonable alternatives (including mitigation) other than those presented in the document.

Such substantive comments may lead to changes or revisions in the analysis or in one or more of the alternatives. There may be many or no substantive comments in each response we received (BLM 2010).

Occasionally, the Forest Service coded the same comment under two or more headings because the subject matter related to more than one discussion area. As such, there may be some responses that direct the reader to another heading where the topic is covered in additional detail. Finally, we did not include in the responses below some comments that the Forest Service coded in their report that we consider non-substantive. For example, there were people who wrote us to thank us for hosting the public meetings, tell us that they thought the document was well written, or explain the mission of their organization or agency.

Directly beneath each subject heading, you will see a list of unique letter ID numbers that correspond to the person, agency, or organization that submitted the comment. A cross-referenced list appears as attachment 1 to this appendix.

In several instances, we refer to specific text in the draft CCP/EA and indicate how the final CCP was changed in response to comments. The full versions of both the draft CCP/EA and the final CCP are available online at: http://www.fws.gov/northeast/planning/MasonNeck_Featherstone/ccphome.html (accessed August 2011). For a CD-ROM or a print copy, please contact the Potomac River National Wildlife Refuge Complex (Refuge Complex) headquarters.

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Service Responses to Comments by Subject

Purpose and Need

Decision Framework Response

(Letter ID#: 34)

Comment: One respondent stated that an EA was insufficient and that NEPA requires that we write an Environmental Impact Statement (EIS).

Response: The Acting Regional Director reviewed the final CCP to assess whether there would be one or more significant environmental effects that would require an EIS under NEPA (40 C.F.R. 1508.27). The determination, detailed in the FONSI (see final CCP appendix H), summarizes why an EIS is not warranted and an EA is sufficient.

Document – Specific

(Letter ID#: 2, 18, 48, 67, 69)

Comment: A representative from Virginia Council on Indians suggested changing the wording of a strategy for Mason Neck Refuge under goal 5, objective 5.1 “Archaeological Resources” in alternative B. The suggested change was from “Raise awareness of the importance of protecting cultural resources through outreach and interpretive information and programs” to “Raise awareness of the importance of protecting cultural resources, and interpret the existing cultural resources through outreach and interpretive information and programs.” The Virginia Council on Indians also offered to assist in the refuge’s interpretation, education, and outreach programs related to the indigenous cultural resources of the refuges.

Response: We have updated the text to reflect the suggested language and look forward to working with the Virginia Council on Indians to improve our cultural resources programs. In the final CCP, we will also identify the Virginia Council on Indians as a partner in chapter 4 for Mason Neck Refuge, under goal 5, objectives 5.1 “Archaeological Resources” and 5.2 “Historical Resources.”

Comment: Two people commented about inconsistencies they saw with information in different parts of the document. One respondent specifically mentioned there were “...somewhat inconsistent descriptions of staff needs. A reasonable person I think may ask at what point fiscal reality influences management planning and it doesn’t make sense to plan from millions of dollars in capital development and a vastly expanded staff or does it make more sense to plan for sufficient funds to provide basic wildlife management and public services at all of the refuges that presently exist.”

The other respondent expressed support for the Service-preferred alternatives, but said he noticed “...incomplete, possibly inconsistent, data on the occurrence of birds and other fauna and flora (e.g., inventories by [ASNV] and the [VNPS] have recorded over 250 bird species, 82 butterflies, 87 dragonflies, and well over 700 plant species).” He went on to describe specific places in the document where we listed species that he thought was incomplete or inconsistent.

Response: In response to the first comment, see our discussion below under the heading “**Staffing.**”

With regard to the second comment, we hope readers can appreciate, given the level of detail we provide in this plan, that we are bound to have some errors. We corrected all typographical or factual errors and inconsistencies in the final CCP that were brought to our attention. In addition, based on information provided by regional experts, we updated information in our species listings in appendix A “Species Known or Suspected on the Refuges and Their Conservation Status.” We also updated information on refuge management activities that was provided to us from reliable sources. Also see our response below under the heading “**Inventories and Surveys.**”

Comment: The VDGIF recommended we update the CCP to reflect that chronic wasting disease (CWD) has been detected in the Commonwealth of Virginia as of January 19, 2010.

Response: We thank the VDGIF for providing updated information on the status of chronic wasting disease in Virginia. We have included this information in the final CCP for each refuge in Chapter 4 “Management Direction and Implementation,” under the heading “Monitoring and Abating Wildlife Diseases.”

Document – Maps

(Letter ID#: 43, 59)

Comment: One commenter wrote that the label for Great Marsh was misplaced on one of the maps in the CCP. Another person who gave public testimony at one of the public meetings had trouble understanding the displayed map and felt it limited his ability to comment.

Response: We regret the error and frustration people may have had with our maps. Fortunately, we were able to discuss the map concerns directly with the gentlemen who attended our public meeting and explain to him what we were trying to convey. We understand what was difficult for him to interpret. We reviewed all of our maps for the final CCP and made some adjustments to improve their presentation and understandability. We hope readers agree. In the event there are still questions, we request that readers call the refuge headquarters for an explanation.

Regulatory Framework

(Letter ID#: 7)

Comment: The consolidated response from the VDEQ listed a number of regulations that may apply to the Service and projects proposed in the CCP.

Response: We appreciate and respect the jurisdiction and authority of State of Virginia agencies. We will continue to coordinate with the VDEQ and other respective State agencies to ensure compliance with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges. In particular, we recognize the responsibility to comply with the Coastal Zone Management Act and meet the requirements for a Federal consistency determination. Throughout their response they recommend specific actions to mitigate impacts on the refuges' natural and cultural resources. We include all applicable recommendations as general strategies in the final CCP, chapter 4, under "Best Management Practices for Construction and Maintenance Activities."

CCP Planning Process and Methodology

(Letter ID#: 6, 18, 37)

Comment: One person commented that the review of wildlife and plants for Mason Neck Refuge in the draft CCP/EA was weak and out of date.

Response: We updated our discussions on wildlife and plant species in the final CCP with the information that was provided to us from reliable sources. One respondent, who has expertise and firsthand knowledge of species and habitats on the refuges, provided us with updated information for our species listings in appendix A "Species Known or Suspected on the Refuges and Their Conservation Status." We greatly appreciate this level of review and willingness to share information. Also see our response below under the heading "**Inventories and Surveys.**"

Comment: One respondent was interested in how the 15-year review of the CCP would be conducted. This person was concerned with the lack of explanation of this review in the draft CCP. In particular, she was interested in whether the review will include "open, public participation" and if there would be any other interim reviews. Finally, she wondered how these reviews would differ from those "promised in the CCP for Occoquan Bay [Refuge]."

Response: Service planning policy (602 FW 3) describes the CCP planning process we used in developing the draft and final CCPs. Part 3.4 (8) of that policy describes the CCP planning step "Review and Revise Plan." Under Part 8(a) Plan Review, the direction is to "Review the CCP at least annually to decide if it requires revisions. Modify the plan and associated management activities whenever this review or other monitoring and evaluation determine that we need changes to achieve planning unit purpose(s), vision and goals."

Under Part 8(b) Plan Revision, the direction is to “Revise the CCP when significant new information becomes available, ecological conditions change, major refuge expansion occurs, or when we identify the need to do so during plan review. This should occur every 15 years or sooner, if necessary. All plan revisions should follow the procedure outlined in this chapter for preparing a plan and will require NEPA compliance...”

There appears to be some confusion about what is to be expected in a “review” of the CCP versus a “revision.” The annual reviews will be conducted by the refuge manager. During the review, the refuge manager will determine whether there is significant new information to warrant a more detailed and formal revision process. As stipulated by Service planning policy (602 FW 3), the revision process will occur at least every 15 years following the detailed CCP planning process outlined in policy. That revision process will also comply with NEPA. Both NEPA and Service planning policy require we inform and involve the public, as we have done during the development of this CCP.

Comment: One commenter suggested postponing the CCP planning process for Mason Neck and Featherstone Refuges by two years due to her perception of corruption and deception in the current administration in Washington, D.C.

Response: We respect this respondent’s right to her own political opinions and affiliations. We wish to emphasize, however, that the Service is committed to creating a CCP for Mason Neck and Featherstone Refuges that is based on the principles of sound biological science, supports the mission of the U.S. Fish and Wildlife Service (Service) and the National Wildlife Refuge System (Refuge System), and helps achieve the purposes of the refuges. In chapter 1 of the draft CCP/EA, we define the purpose of, and need for, a CCP for these refuges. We believe we have developed a plan with a strong and clear vision for how to manage Mason Neck and Featherstone Refuges to best conserve wildlife resources and offer appropriate and compatible wildlife-dependent recreational opportunities.

Throughout the planning process, we invited elected officials, State and county agencies, the public, our partners, and organizations to provide comments and feedback as we developed our recommendations. We feel public and partner involvement not only ensures that the planning process is transparent, but also holds us accountable to creating a scientifically sound and defensible management plan.

By delaying the completion of this CCP for two years, Mason Neck Refuge and Featherstone Refuges would continue to operate without a master plan, and the strategic direction a CCP provides. Also, a delay would put us in violation of a Federal law; the 1997 Refuge Improvement Act requires that each refuge which existed prior to 1997 have a completed and approved CCP by 2012.

CCP (Use One Plan for All Three Refuges in Potomac River National Wildlife Refuge Complex)
(Letter ID#: 9, 13, 16, 18, 24, 38, 39, 40, 48, 67)

Comment: Ten respondents commented that they would have liked to see the Service develop one CCP that covers the entire Potomac River National Wildlife Refuge Complex, including Occoquan Bay, Mason Neck, and Featherstone Refuges. The following quote reflects the general sentiment of these comments:

...this draft falls short of being sufficiently comprehensive to meet the demands of the entire Refuge Complex. Contained within the draft are what seem to be plans for two, essentially separate, refuges rather than a plan for integral parts of an overall complex of natural ecosystems...At the outset of this planning process, various groups and individuals argued that without a single planning process there can be no truly comprehensive plan for the management and staffing of the entire Refuge Complex. This would necessitate including not just the two units addressed in this draft but Occoquan Bay [Refuge] as well. The plan for that refuge was done in 1998, is quite out of date, and – despite significant issues raised at the time of its adoption – has had no public review since then (although such reviews were promised every five years). Presumably, under current rules, that plan’s review must now occur no later than 2013 which is certainly soon enough to warrant its inclusion in this current planning process.

Response: We began the CCP planning process for Mason Neck and Featherstone Refuges in 2006. At that time, we made the decision not to include Occoquan Bay Refuge in this new planning effort for several reasons. First, Occoquan Bay Refuge CCP was only 8 years old and was developed to be a 15-year plan. Second, we felt it was important to focus our attention on developing plans for the other two remaining refuges in the Potomac River Refuge Complex in order to comply with the 1997 Refuge Improvement Act mandate to complete all refuge CCPs by 2012. Third, in our opinion, management of Occoquan Bay Refuge had not appreciably changed from the 1997 CCP decision, or in situations where it had, we addressed those changes in subsequent, more recent planning processes which included a 30-day public input, review, and comment period. Those additional planning processes included development of a Fire Management Plan and accompanying EA (April 2001), the Deer Management Plan and accompanying EA (October 2001 and April 2007), the Potomac River Refuge Complex Administrative Headquarters and Visitor Facility Plan and accompanying EA (February 2009), and the Habitat Management Plan (April 2010).

We appreciate and respect the comment that having two separate CCPs covering the Refuge Complex diminishes the interdependent links among the three refuges as part of a complex administered together with many shared resources. However, we wish to point out there are many places in the draft CCP/EA where we emphasize the Refuge Complex connections. For example, the inside title page includes a vision statement for the Refuge Complex. In chapter 1, in our “Introduction” and accompanying map 1.1, and under “Refuge Management Profiles,” we describe details about the Refuge Complex and the relationship among the three refuges. In chapter 2, under “Potomac River Refuge Complex Administration,” we describe staffing, budget, the headquarters facility, and the Friends Group for the Refuge Complex. We describe staffing needs and proposals for the Refuge Complex in chapter 3 under “Actions Common to Alternatives B and C” and in appendix E “Staffing Charts.” We make a recommendation for the priority order in filling Refuge Complex positions in appendix C “Refuge Operations Needs.” We include consideration of all three refuges in chapter 4, “Cumulative Impacts.” Finally, appendix B includes findings of appropriateness and compatibility determinations made for all three refuges combined in the Refuge Complex.

We will make a recommendation to the Regional Director that a more seamless connection between the three refuges is made when the CCP revision process for Occoquan Bay Refuge is initiated.

CCP Planning Cycle

(Letter ID#: 6, 18, 24, 48, 67)

Comment: Five respondents commented on the length of the CCP planning cycle. Specifically, they felt that 15 years was too long for a CCP to be in place; most suggested the planning cycle be reduced to 5 years. One person wrote, “Fifteen years seems an awfully long time for a strategic plan; 5 or 10 years max[imum] seems much more reasonable.” Another stated,

...15 years is a long time to wait for a general review of something as comprehensive as this [CCP] purports to be. A five year plan review process was in place apparently at the time the Occoquan Bay Comprehensive Plan was adopted and I’m concerned about how this process works because there has not been, as far as I’m aware, any public review at the five year intervals and that raises the possibility that we are not sure what will happen at the end of the 15 years for this plan if, in fact, it can be reduced to five years which is in my view a much more realistic timeframe than 15.

Response: The final CCP for Occoquan Bay Refuge (USFWS 1997) states, “The objectives identified in this Comprehensive Conservation Plan are expected to be accomplished in approximately 15 years, with reviews every five years to make adjustments due to new information...data collected will be used to continually evaluate and adjust management activities” (pages 49-50).

In our response above under “CCP Planning Process and Methodology,” we summarize Service planning policy (602 FW 3) specifically as it relates to plan review and revision. In summary, an informal review should occur annually to determine whether a minor or major revision is warranted. CCPs should be modified “...whenever this review or other monitoring and evaluation determine that we need changes to achieve planning unit purpose(s), vision, and goals.” A CCP should be revised “...when significant new information becomes available, ecological conditions change, major refuge expansion occurs, or when we identify the need to do so during plan review. This should occur every 15 years or sooner, if necessary.”

It is incumbent on the refuge manager to conduct CCP reviews. The refuge manager should then notify the Assistant Northeast Regional Director for the National Wildlife Refuge System (e.g. Regional Refuge Chief) if they believe a major revision is warranted at any time prior to the 15-year revision requirement. Regional refuge planning staff can then provide assistance in conducting detailed planning and NEPA analysis, as appropriate.

Outside of Scope

(Letter ID#: 43)

Comment: One respondent felt that the postal address for Mason Neck Refuge was listed incorrectly in the CCP as “Lorton, VA 22079,” and should instead be listed as “Mason Neck, VA 22079.”

Response: The determination of what city name is affiliated with a particular zip code is outside of the proposed action and the purpose of, and need for, a CCP as stated in the draft CCP/EA, chapter 1. However, we will let readers know that we defer to the U.S. Postal Service’s Web site for naming conventions. The Web site identifies the “Actual” city name for zip code 22079 as Lorton, VA. However, the Web site also indicates that an “Acceptable” city name alternative for this zip code is Mason Neck, Virginia (USPS 2011). We will continue to use Lorton, VA.

Physical Environment

Global Climate Change

(Letter ID#: 6, 13)

Comment: Two letters contained comments on global climate change. One urged the refuge to consider sea level rise in all planning processes, due to its potential to cause flooding adjacent to the Potomac River. Another respondent felt that that discussion of climate change in the draft CCP/EA was “filler” and simply a “...repeat of overworked PC drivel as is trying to predict its impact on the wetlands and swamp in the area.”

Response: We disagree that our discussion on climate change is “drivel.” On the other hand, we recognize that we currently provide few specific details on the direct impacts predicted for Mason Neck and Featherstone Refuges from climate change. In the draft CCP/EA we identify climate change impacts as an issue in chapter 1 for both refuges under the discussion on “Issues, Concerns, and Opportunities.” We also discuss climate change impacts in chapter 4 under “Cumulative Impacts.” There is uncertainty about the exact impacts of climate change and, unfortunately, we are currently unaware of any specific studies on the predicted localized effects of climate change near the Refuge Complex. As proposed in the draft CCP/EA, chapter 3 for Mason Neck, under alternative B, goal 1, objective 1.3, we plan to conduct a Sea Level Affecting Marshes Model (SLAMM) analysis to better understand how sea level rise may affect the Refuge Complex’s marshes. The information we gain from this analysis will help us to make more informed management decisions. In chapter 4, we describe how we would manage Refuge Complex lands to increase resiliency and redundancy, and improve the diversity, integrity, and health of refuge habitats. We also plan to use an adaptive management approach on refuge lands to adjust to new information about, and respond to, impacts caused by climate change.

The Service has been actively engaged in leading Federal natural resource agencies to develop guidance on assessing and responding to the impacts on climate change (<http://www.fws.gov/home/climatechange/>; accessed June 2011). Since publication of our draft CCP/EA, several Service publications have been issued on this topic, including one that involved multiple agencies and non-governmental organizations titled “Scanning the Conservation Horizon, A Guide to Climate Change Vulnerability Assessment.” This document is available online at: <http://www.nwrf.org/vulnerabilityguide> (accessed June 2011). The guidance in this document was produced by

an expert workgroup on climate change vulnerability assessment convened by the National Wildlife Federation in collaboration with the Service. The document provides guidance on assessing the vulnerability of species, habitats, and ecosystems in an effort to help practitioners understand how vulnerability assessments can help them respond to the challenges of managing natural resources in an era of rapid climate change. This guidebook is one of many tools the Service advocates use of to identify, assess, and adapt strategies to deal with the impacts of climate change. We will use these and other peer-reviewed science publications, as well as work with other Federal and State agency partners, and resource experts, to insure we are working with the best available information prior to making resource decisions.

Hydrology and Water Quality

(Letter ID#: 7, 41)

Comment: The VDEQ submitted comments relating to the Virginia Water Protection Permit Program as it relates to the protection of surface waters. They felt the CCP did not clearly address whether any of the projects proposed in the draft CCP/EA would impact surface waters. In particular, they referenced three proposed actions that might have potential impacts to water quality and wetlands: herbicide use to control invasive plants in wetlands, trail construction and maintenance, and the proposed construction of Refuge staff quarters. The VDEQ further stated that if any actions could impact surface waters under the jurisdiction of the Commonwealth of Virginia that the Service would need to apply for a water protection permit from the VDEQ Northern Regional Office (NRO). They recommend that projects avoid or minimize impacts to surface water to the maximum extent practicable.

The VDEQ also submitted comments related to the Virginia Pollutant Discharge Elimination System Permit Program and offered many specific suggestions to the Service regarding practices, regulations, and permits that may be required for any proposed projects that may affect water quality, wetlands, or drinking water. They clarify that VDEQ is the appropriate State agency for coordination on water quality data, citizen water quality monitoring, and discharge permits for pesticides and wastewater; and that the Virginia Marine Resources Commission "...regulates encroachments in, on, or over state-owned subaqueous beds as well as tidal wetlands..." Also, they mention that updated information for the CCP is in the draft Integrated Report (published in 2010) which has more current details on Total Maximum Daily Loads (TMDLs) and other water quality information for waters near the refuges. In addition, they mention they are an interested partner in the establishment of a water quality monitoring station at the refuges.

VDEQ also emphasized the need for refuge activities to be compliant with the Coastal Zone Management Act and Virginia Coastal Zone Management Program Regulations, and the Chesapeake Bay Preservation Act and Chesapeake Bay Preservation Area Designation and Management Regulation administered by VDCR Division of Chesapeake Bay Local Assistance.

One individual also submitted the following comment, "We would like to see a greater emphasis on improved water quality in your plan. "

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding hydrology and water quality. Specifically, we will review requirements applicable to refuges and submit applications for all necessary permits before we actually undertake activities of concern (e.g. herbicide use, trail construction and maintenance, and the Refuge staff quarters construction). We also included the specific suggestions made by VDEQ for avoiding or minimizing unavoidable impacts to wetlands and waterways. We listed these as general strategies in the final CCP, chapter 4, under "Best Management Practices for Construction and Maintenance Activities". We also updated the CCP to list the latest TDML information using the 2010 Integrated Report.

We agree that protecting water quality is an important component of refuge management and included actions throughout the draft CCP/EA to ensure that no degradation occurs. For example, in chapter 3, alternative B for Mason Neck Refuge, goal 2, objective 2.4 “Aquatic Habitat and Water Quality” and in alternative B for Featherstone Refuge, goal 1, objective 1.2 “Shoreline Protection, Wetlands, and Water Quality,” we detail strategies and monitoring we would undertake in the proposed action to protect and enhance water quality. Finally, we welcome VDEQ as a partner in developing and implementing a water quality monitoring program on the refuges and will look to their expertise when we initiate the project.

Storm Water Control

(Letter ID#: 7)

Comment: The VDEQ stated that the Service may need to obtain a permit and develop a storm water pollution prevention plan in order to comply with the Virginia Stormwater Management Law and Regulations. In particular, they referenced the proposed action to construct a Refuge staff quarters as an activity that might require the permit and plan. They also clarify that VDCR is the appropriate point of contact for storm water management related to construction activities.

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding storm water control. Specifically, we will review requirements applicable to refuges and submit applications for all necessary permits before we actually undertake the construction of Refuge staff quarters.

Erosion and Sediment

(Letter ID#: 7, 50)

Comment: The VDEQ stated that the Service may need to obtain a permit and develop an erosion and sediment control plan for certain activities in order to comply with Virginia Erosion and Sediment Control Law and Regulations. They suggest that the proposed construction of Refuge staff quarters, other clearing and grading activities, and related land disturbances activities that result in... “land-disturbance of equal to or greater than 2,500 square feet...” should be regulated by a permit and plan submitted to VDCR.

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding erosion and sediment control. Specifically, we will review requirements applicable to refuges and submit applications for all necessary permits before we actually undertake the construction of Refuge staff quarters and other major land clearing activities.

Comment: One person wrote that care must be taken to protect Featherstone Refuge because a small number of people walking on a trail can create erosion. The respondent stated witnessing rapid erosion occurring on trails on the refuge, including deepening of trails and trails becoming muddier. The respondent was particularly concerned due to the amount of wetlands on the refuge, and wrote “...you simply can’t walk across a wetland without causing erosion. Wetlands are sensitive and there is no such thing as a low impact use of a wetland.”

Response: In the draft CCP/EA, under chapter 3 for Featherstone Refuge, goal 2, objective 2.4 “Wildlife Observation and Photography,” we describe our proposal for new trails on this refuge. In chapter 4 for Featherstone Refuge, we describe the impacts we anticipate from developing trails as proposed in alternative B under the discussions on “Soil Impacts,” “Forest Habitat Impacts,” and “Wetland Impacts.” In each of those discussions we emphasize that best management practices would be followed in designing and constructing the trail and that outreach and enforcement will be important to insuring that resource impacts are kept to a minimum.

Solid and Hazardous Waste Management

(Letter ID#: 7)

Comment: The VDEQ stated that a review of their Geographic Information System (GIS) database did not reveal any documented hazardous waste sites within a 1/2-mile radius that would impact or be impacted by refuge activities. However, a cursory review of data files by the VDEQ Division of Land Protection and Revitalization determined that "...there are a number of hazardous waste sites, solid waste sites, voluntary remediation program sites, and formerly used defense sites located within the zip code..."; however, their proximities to the refuges is unknown and encourage Refuge Complex staff to look into this further. With regard to refuge management activities, they specifically mention the need to check, if applicable, all structures proposed to be demolished for asbestos-containing materials and lead-based paints. They also commented on the status of hazardous materials cleanup at the former defense site on Occoquan Bay Refuge (e.g. Nike Battery 64/65).

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding solid and hazardous waste management. In addition, prior to the demolition of any structures, we will check for asbestos-containing materials and lead-based paints.

With regards to the comments on hazardous materials cleanup at the former "NIKE Battery 64/65," that discussion is outside the scope of this CCP as it does not relate to either Mason Neck or Featherstone Refuge. If you would like to discuss this matter further, please contact the refuge manager directly.

Air Quality

(Letter ID#: 7, 37)

Comment: The VDEQ stated that they are charged with carrying out the mandates of Virginia's Air Pollution Control Law and is responsible for Virginia's federal obligations under the Clean Air Act. They identify several proposed refuge activities that may affect air quality: refuge trail maintenance, land-clearing debris burning, fugitive dust during construction, and fuel burning equipment. As with previous items they offered specific jurisdiction, regulations, permitting requirements, and suggested practices concerning maintaining air quality.

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding actions that could affect air quality. Specifically, we will review requirements applicable to refuges and submit applications for all necessary permits before we actually undertake the construction of Refuge staff quarters, new trails, and other major land clearing activities. We also include their recommended practices to minimize fugitive dust as general strategies in the final CCP, chapter 4, under "Best Management Practices for Construction and Maintenance Activities."

Comment: A respondent wanted prescribed burning prohibited on the refuges because of human health concerns. In her opinion, fine particulate matter generated from burning could cause health problems such as "lung cancer, heart attacks, strokes, allergies, pneumonia, [and] asthma."

Response: We understand the concern over air quality and human health impacts of prescribed burning. We rarely burn on either refuge, and do not propose it in the draft CCP/EA as a habitat management tool. If future habitat monitoring reveals that prescribed burning is necessary to maintain forest health, we would propose a program that would follow strict protocols designed to minimize impacts to human health and safety. For example, we would only burn when wind conditions are such that smoke and particulate matter are well diluted in the atmosphere and carried away from sensitive areas such as hospitals or concentrations of residential development. We would obtain all State permits and follow all regulations and notification requirements for national wildlife refuges.

Our evaluation of other refuge management activities and their effects on air quality is included in the draft CCP/EA chapter 4, under "Air Quality Impacts."

Shoreline Protection

(Letter ID#: 10, 19, 40, 71)

Comment: One individual and the SWPD supported shoreline protection on the refuges. The SWPD encouraged the Service to work collaboratively to address degraded shorelines. Another respondent thought the CCP comments on shoreline protection were vague, writing, “We find the CCP comments regarding shoreline protection at Featherstone [Refuge] to be unnecessarily vague. The topography at Featherstone is dramatically different from the Mason Neck [Refuge]. Hardening the shoreline at Featherstone, rather than proposing a ‘Living Shoreline’ comparable to what the Service has highlighted at Eastern Neck National Wildlife Refuge, would be a direct invitation for every property owner in the Chesapeake Bay to build bulkheads. The FWS should set the example at Featherstone for a managed retreat, if sea level rises.”

Response: Shoreline protection is a huge concern that we mention throughout the draft CCP/EA. We identify it in chapter 1 as a key issue raised by many during the scoping phase of the CCP process. In chapter 2, we describe the existing shoreline protection structures (e.g., breakwaters) off Mason Neck Refuge, which were part of a Wilson Bridge mitigation project in State waters. In chapter 3, under Mason Neck Refuge, preferred alternative B, goal 2, objective 2.3 “Shoreline Protection,” we describe our proposal to continue to work with partners to maintain and evaluate the existing breakwater structures. We also state that our proposal includes working with experts to conduct a risk assessment to identify and prioritize other potential shoreline restoration areas and identify viable protection methods. Our intent is the same for Featherstone Refuge’s shoreline, as described in chapter 3, under Featherstone Refuge, Service-preferred alternative B, goal 1, objective 1.2 “Shoreline Protection, Wetlands, and Water Quality.”

We acknowledge that our proposal is vague as it relates to specific protection methods. This is intentional as we have no design in mind and recognize that we need to get additional expertise to conduct the risk assessment and to evaluate potential viable protection methods. Providing protection through a “living shoreline” would be an important method to consider based on our successes at other refuges in the Chesapeake Bay. However, prior to discussing options with experts, we did not want to limit ourselves to any one method. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under the heading “Conducting Additional NEPA Analysis” we state that before a decision is reached on the design and construction of new shoreline protection measures, we would be required to conduct additional or supplemental NEPA analysis.

Comment: A commenter thought that placing hunting blinds offshore would negatively impact any efforts to protect shorelines, while only providing a very limited number of new waterfowl hunting opportunities.

Response: We do not believe the State regulated use of hunting blinds offshore would negatively impact our shorelines. Hunting blinds currently exist off our refuge shorelines, and we have not noticed any impact on refuge shorelines. We would continue to use outreach and enforcement to insure no impacts occur. In addition, see our response under “**Hunting – Waterfowl and Hunting Blinds**” below.

Cultural Resources

Heritage and Cultural Resources

(Letter ID#: 7, 19, 69)

Comment: Three respondents, including the VDGIF, expressed support for protecting heritage and cultural resources on the refuges. The VDEQ submitted a list of applicable regulations and jurisdictions relating to cultural resources. They also stated that the VDHR fully supports the Service-preferred alternatives for both Mason Neck and Featherstone Refuges. Another respondent felt that meeting objectives for heritage and cultural resources could be accomplished under current management (alternative A) for both refuges through the use of existing organizations and volunteer groups with no impact on the refuge’s budget.

Response: We will continue to coordinate with the VDEQ, the VDHR, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding archaeological and historic sites. Appendix D has a letter we received from VDHR indicating compliance with our proposals in the draft CCP/EA.

We appreciate the support for cultural resource protection and agree with the suggestion that we work with partners to accomplish priority work. As projects arise, we would seek those opportunities.

Refuge Administration

Refuge Administration and Goals

(Letter ID#: 9, 17, 22, 23, 25, 34, 37, 40, 43)

Comment: One person sent in a list of “Do Nots” including no pesticides, no logging, no new roads, and no burning.

Response: The commenter did not provide us with substantive comments to support their opposition to these actions, but merely provided a list of actions of concern. As such, we are unable to respond in a specific way. In addition, not all of the actions of concern are actually in our proposal. In our “**Introduction**” above, we define substantive comments as those that suggest the analysis is flawed in a specific way, and challenge the accuracy or adequacy of information presented, or challenge the methodology, or assumptions used (BLM 2010).

For those actions of concern listed in the letter that are part of our proposal (e.g., use of herbicides to control invasive plants, use of pesticides to control invasive pests during a regional epidemic, and trail infrastructure), we stand by our descriptions and analysis in the draft CCP/EA, chapter 4.

Comment: One commenter felt the refuges should encourage wildlife viewing, while another asked the Service to establish passive observation zones (without development) on the refuges. Another commenter felt the refuges could offer greater public use opportunities while “still protecting flora and fauna.”

Response: We believe our proposed programs under both Service-preferred alternatives (alternative B for both refuges) in the draft CCP/EA for wildlife observation, nature photography, environmental education, and interpretation represent a reasonable, practical, and feasible approach over the next 15 years in support of meeting the purpose and goals of Mason Neck and Featherstone Refuges and the mission and goals of the Refuge System. The proposal promotes wildlife viewing and nature photography, and includes some new infrastructure (e.g., trails and viewing platforms), but they would all occur in existing, disturbed areas, such as old roadbeds or footpaths. The draft CCP/EA, in chapter 3 for Mason Neck Refuge, goal 4, objective 3.4 “Wildlife Observation and Photography,” and in chapter 3 for Featherstone Refuge, objective 2.4 “Wildlife Observation and Photography,” we describe our proposal and our rationale. In the draft CCP/EA, in chapter 4 under discussions for air quality, soils, water quality, wetlands, and wildlife, we describe both the beneficial and adverse impacts we predict from our proposal. Also, appendix B includes compatibility determinations for “Wildlife Observation, Photography, Environmental Education, and Interpretation.”

Comment: One respondent suggested the Service use Mason Neck Refuge as its “flagship” refuge due to its proximity to the Nation’s capital in Washington, D.C. to demonstrate “the benefits of wildlife habitat preservation” and “private, public and intergovernmental cooperation.”

Response: The Refuge Complex is indeed strategically located to the Washington, D.C. metropolitan area and offers a welcome respite from the surrounding urban setting. We also agree that the Refuge Complex, including Mason Neck Refuge, provides an opportunity to showcase cooperative conservation opportunities. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, the objectives and strategies under goal 4 were developed with the intent to improve outreach and community involvement, and to encourage and foster new partnerships to advance conservation in the area. In chapter 3 under “Actions Common to All Mason Neck Refuge CCP Alternatives,” in the subheading “Coordinating with Partners, Friends of Potomac River Refuges, and the Mason Neck Peninsula Community,” we also identify several strategies to enhance our relationship with the Mason Neck Mangers Group and the Friends Group. We welcome other ideas and opportunities on how to enhance these opportunities further.

Comment: Several commenters stated that the purpose of national wildlife refuges are to preserve and enhance natural habitats and native wildlife. Another person was concerned that the Service is suffering from “mission creep,” stating that “[e]ither you are managing refuges to protect wildlife or you are managing parks for the public’s entertainment.” The commenter felt the Service was planning to manage Mason Neck and Featherstone Refuges more like a national park by proposing to offer so many recreational opportunities. The respondent wrote, “We neither need nor can afford two National Park Services” and that the Service should be “turned over to the National Park Service to combine duplicate functions and reduce costs.”

Response: In the draft CCP/EA, chapter 1, under the heading “The Service and Refuge System Policies and Mandates Guiding Planning,” we summarize the mission of the Refuge System, its goals, and significant policies guiding the management of refuges. Of the five stated goals of the Refuge System, three goals relate to natural resource protection and conservation, and two are focused on people. These latter two goals are

- Provide and enhance opportunities to participate in compatible, wildlife-dependent recreation; and
- Help to foster public understanding and appreciation of the diversity of fish, wildlife, plants, and their habitats.

As we state in the draft CCP/EA in chapter 3, for both Mason Neck and Featherstone Refuges, the introduction to each respective preferred alternative B includes a statement that we believe alternative B for both refuges represents “...the best combination of actions to meet the Refuge System mission and policies, and refuge purposes and goals. It is also the most effective of the alternatives in addressing public issues.”

Appendix B in the draft CCP/EA presented findings of appropriateness and compatibility determinations explaining our rationales for allowing or not allowing activities. We stand by these recommendations and our determination that alternative B best meets the Service and Refuge System mission and refuge purposes.

Comment: One person felt equal attention should be given to Mason Neck Refuge, and was concerned that Occoquan Bay and Featherstone Refuges were receiving more attention.

Response: It is the responsibility of the refuge manager to determine the distribution of resources among the three refuges in the Refuge Complex each year. This decision is based on many factors including the availability of staff, budgets and other resources, priority and time-sensitive projects, issues, concerns, threats, and opportunities.

In addition, as noted below under “**Staffing**,” the CCP is meant to provide, “...long-term guidance for management decisions and set forth goals, objectives, and strategies needed to accomplish refuge purposes and identify the Service’s best estimate of future needs.” Decisions on how to distribute specific resources each year to implement the CCP are at the discretion of the refuge manager.

Refuge Establishment and Land Acquisition History

(Letter ID#: 15, 24, 48, 67)

Comment: Two respondents wanted Elizabeth Hartwell to be given full credit for being instrumental in the establishment of Featherstone Refuge.

Response: We apologize for omitting this from the draft CCP/EA. We will include this information in the final CCP, Chapter 3 “Refuge and Resource Descriptions,” under the heading “History of Refuge Land Acquisition” for Featherstone Refuge.

Comment: One person supported Mason Neck Refuge purchasing the 789 acres in fee from Northern Virginia Regional Park Authority. Another suggested annexing Mason Neck State Park and administering it all under a Potomac River Complex.

Response: We appreciate the support for our proposal to purchase the 789 acres from the Northern Virginia Regional Park Authority.

With regards to annexing Mason Neck State Park, if the State of Virginia were interested in closing Mason Neck State Park and/or divesting itself of its interest in the property, then the Service would evaluate purchasing the land as an addition to the refuge. In the meantime, the Potomac River Refuge Complex works cooperatively with Mason Neck State Park to manage wildlife populations, as well as outdoor activities. Our working relationship has proven beneficial to both agencies as well as the visiting public. This design provides conservation for the benefit of wildlife while also allowing opportunity for the public to take pleasure in the use of this area. Therefore, we do not believe it would be beneficial, nor in the best interest of either Mason Neck Refuge or Mason Neck State Park, to annex this park.

Staffing

(Letter ID#: 5, 6, 13, 14, 15, 16, 18, 19, 40, 48, 64, 67)

Comment: Thirteen comments referred to staffing; most were in favor of hiring a biologist. For example, a respondent wrote, “We believe that responsible management of refuges requires the onsite, regular presence of a biologist and we urge the Service to hire at least one.” However, two people questioned whether hiring staff was prudent given current budgets constraints and uncertainty about future funding. Another respondent stated that no employee hires are identified for Featherstone Refuge in appendixes C and E of the draft CCP/EA.

Response: In the draft CCP/EA, chapter 3 for Mason Neck, under “Actions Common to all Mason Neck Refuge Alternatives,” subheading “Refuge Staffing and Administration,” and under “Actions Common to Alternatives B and C Only,” subheading “Implementing the National Staffing Model,” we describe our proposed Refuge Complex staffing by alternative. The respondent is correct that we are not proposing any staff specifically stationed at Featherstone Refuge. Refuge Complex staff are shared amongst the three refuges in the Refuge Complex, including Featherstone Refuge. Appendix E “Staffing Charts,” presents the proposed staffing graphically. Also in chapter 3, in our “Introduction” to alternative B, we describe the refuge staffing we recommend. This is followed in chapter 3 by our presentation of goals and objectives that include a strategy to hire one or more of the staff identified. In Appendix C “Refuge Operations Needs System,” we recommend a priority order for acquiring new staff under alternative B.

As we review the information on staffing we provided, the numbers are all consistent with a recommendation to eventually fill a total of 16 positions for the Refuge Complex. That being said, the respondents comment about fiscal realities and whether it is reasonable to assume we would ever have the funding to support that many staff is well taken. We appreciate that this may seem like a reach given past funding and challenging future forecasts for the Federal budget. However, we maintain as stated in the inside cover of the draft CCP/EA that,

Comprehensive Conservation Plans provide long- term guidance for management decisions and set forth goals, objectives, and strategies needed to accomplish refuge purposes and identify the Service's best estimate of future needs. These plans detail program planning levels that are sometimes substantially above current budget allocations and, as such, are primarily for Service strategic planning and program prioritization purposes. The plans do not constitute a commitment for staffing increases, operations and maintenance increases, or funding for future and acquisition.

Funding, Budget, and Implementation

(Letter ID#: 9, 11, 15, 18, 19, 24, 36, 49, 57)

Comment: Ten comments referred to either funding, budget, or how the Service would implement its goals and objectives. Most of these expressed doubt that the Service's goals could become reality due to current Federal budget constraints and uncertainties. A commenter wanted the refuges to focus on using their funds wisely and plan for reduced budgets. They stated, "Allocation of funds should be given to protection of Bald Eagle habitat, flora, fauna, shorelines, public access (where appropriate) and management of existing facilities and habitat, rather than planning new facilities." Another wrote, "Does it really make sense under present and foreseeable conditions to plan for a multi-million dollar administration and visitor's center at Occoquan Bay and a vastly expanded staff ...? Or, does it make more sense to plan for sufficient funds and staff to provide basic wildlife management and public services at all of these refuges?" Several people also suggested using more volunteers to help offset the refuges costs.

Response: Under the "**Staffing**" discussion above we share the statement that was published on the inside cover of the draft CCP/EA, which describes how the CCP provides strategic direction and is not meant to be a commitment of funding or resources.

The decision to develop and construct a visitor center at Occoquan Bay refuge was made under a separate NEPA analysis and is not part of this CCP.

The suggestion to use more volunteers to accomplish priority work, given limited refuge funding, is a good one and is something we have pursued at various levels in the past and will continue into the future. Volunteers are vital to many refuge programs, and we value all the time and effort that people have donated. However, we believe it is important to point out that organizing for volunteer activities, including developing meaningful work, providing appropriate tools, support, and oversight, takes a fair amount of staff time and some funding. We need to pick those projects carefully until we have more staff on board.

Comment: One person asked, "How long will it take for a decision to be made once the public review period is completed? The timing is important for our conservation program."

Response: We are also interested in completing the CCP and are diligently working to that end. We hope to have a final plan approved in July or August 2011. The final decision rests with the Acting Regional Director.

Partnerships and Volunteers

(Letter ID#: 6, 9, 10, 11, 12, 13, 28, 30, 40, 48, 52, 57, 61, 62, 67, 79)

Comment: Seventeen commenters encouraged the Service to plan for and better use volunteers and partnerships. For example, one respondent wrote, “The FWS should make a clearer commitment in the CCP to work with partners to enhance the inventory data on species and communities at Featherstone [Refuge].” Another wrote, “The USFWS must better utilize the volunteer resources available to assist in its management of the Wildlife Refuges. Volunteers have proven to be a valuable asset towards achieving management goals, improving public facilities, and enhancing the visitor experience.” Several people specifically mentioned using volunteers to aide with bird banding projects. Fairfax County, the Native Plant Society, the Northern Virginia Chapter – Delta Waterfowl, and others also encouraged the Service to foster partnerships with them.

Response: We fully agree with the comments about the value and importance of engaging volunteers and partners in the work that we do to support refuge goals, and we mention their vital role in numerous places in the document. We only regret that we cannot accommodate all offers of volunteer time, nor can we implement all the project ideas brought to us.

We provide an overview of our partnerships and volunteer program in the draft CCP/EA in chapter 2 under “Refuge Administration.” In chapter 3 for Mason Neck Refuge, we identify as an “Action Common to all Mason Neck Refuge CCP Alternatives” the intent to enhance our efforts at “Coordinating with Partners, Friends of Potomac River Refuges, and the Mason Neck Peninsula Community,” including the Mason Neck Land Managers Group. Also, under alternative B goal 4, objective 4.1 “Volunteers,” objective 4.3 “Partner Outreach,” and objective 4.5 “Research,” we emphasize the importance of either volunteers or partners to our successes. In fact, most of the objectives under goals 1, 2, and 3 identify one or more strategies that use either volunteers or partners as a key resource to accomplish the work.

Interagency Agreements and Coordination

(Letter ID#: 7, 13, 23, 39, 40, 79)

Comment: Six commenters wanted the refuges to enhance their interagency agreements and coordination with other agencies. Some of the organizations and agencies specifically mentioned as potential partnerships opportunities included the following:

- Fairfax County
- Leesylvania State Park
- Mason Neck State Park
- Virginia Institute of Marine Science
- Bureau of Land Management - Meadowood Special Recreation Management Area
- Northern Virginia Regional Park Authority - Pohick Bay Regional Park

Fairfax County encouraged the FWS to consult and collaborate with several other agencies while implementing actions proposed in the draft CCP/EA. Specifically, they mentioned the following opportunities:

- Consulting with the Virginia Institute of Marine Science to select the most appropriate shoreline stabilization methods to protect eroding refuge coastlines and to develop strategies to adapt to sea level rise and other climate change effects; they also suggested referring to the “Fairfax County and the City of Alexandria, Virginia Shoreline Inventory Report Methods and Guidelines” for more information
- Consulting with the Virginia Department of Planning and Zoning to ensure the location of staff housing is consistent with the county’s Environmental Quality Corridor policy

- Referring to the Lower Occoquan Watershed Management Plan to identify appropriate stream restoration projects
- Continuing to collaborate with staff in Natural and Cultural Resources Management Branches of the Fairfax County Park Authority and the Stormwater Planning Division of the Department of Public Works and Environmental Services to develop curricula for environmental and cultural resource education and interpretation

Response: As noted in our response under “**Partnerships and Volunteers**” above, we are indebted to our partners and volunteers for their assistance in accomplishing priority work on both refuges. We regret that we cannot accommodate all the suggestions or ideas brought to our attention. However, coordinating with other Federal and State agencies in accomplishing mutually beneficial work is a priority for us. We are presently working with most of the State and county agencies listed in the comment. We appreciate the suggestions to collaborate with specific agencies on particular actions that we identified under alternative B. Our plans will be to follow through on these recommendations.

Comment: Two respondents indicated a concern with shoreline developments to support visitor services. They specifically mentioned, “In coordinating with the National Park Service to manage the Captain John Smith Trail, we urge you not to create extensive shoreline visitor services infrastructure that would displace native habitats and wildlife or cultural resources.”

Response: Our proposed visitor services infrastructure for the refuges are depicted on maps 4.1, 4.2, and 4.3. No developments would occur without first evaluating site-specific cultural and natural resources impacts and their potential to displace native habitats. Also in the draft CCP/EA, chapter 3 for Mason Neck Refuge, goal 3, objective 3.5 “Interpretation Program” and Featherstone Refuge, goal 2, objective 2.5 “Interpretation,” we describe our coordination with the National Park Service on the Captain John Smith Chesapeake National Historic Trail. We plan to continue coordinating with the National Park Service on identifying opportunities that would be compatible with refuge purposes and the Refuge System mission. In chapter 3 for Mason Neck Refuge, goal 2, objective 2.3 “Shoreline Protection,” we have a strategy that specifically states we would “Engage in public outreach and education to explain the sensitive nature of shoreline habitats and the importance of reducing human disturbance, particularly along the proposed Captain John Smith Trail.”

Special Use Permits

(Letter ID#: 52)

Comment: One commenter was concerned with the need to conduct research to gather baseline data on the species present on the refuges. They wrote, “It’s also appropriate for us to have research permits in order to expand upon the information. If you look at the CCP itself, you’ll find that there is a generic list of species rather than a refuge specific list of species.”

Response: We concur that conducting research that is compatible with refuge goals and objectives is important for our future understanding and management of refuge resources. In the draft CCP/EA, in chapter 3 for both Mason Neck and Featherstone Refuges, under “Actions Common to All Alternatives,” we discuss our support for “Research and Investigations” and the conditions under which we will facilitate it. As we gain new information, we would update our species lists, outreach, interpretation, and education materials, and habitat management and other step-down plans as appropriate.

Infrastructure

(Letter ID#: 7, 9, 15, 16, 18, 23, 39, 40, 69)

Comment: The VDEQ responded with specific regulations, permit requirements, jurisdictions, and suggestions concerning sewage systems for Mason Neck staff housing.

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding sewage systems.

Comment: Two people wanted to delay construction of the visitor center at Occoquan Bay Refuge until all three of the refuges of the Potomac River National Wildlife Refuge Complex were under the same planning umbrella. Another specifically stated, “I generally support the future location of a refuge headquarters at Occoquan Bay National Wildlife Refuge, but urge two possible courses of action: 1) First explore consolidating the Mason Neck Elizabeth Hartwell Refuge with the adjacent Virginia Mason Neck State Park and using the state park existing facilities for the refuge headquarters, offices, etc.; and 2) if the headquarters is located at Occoquan Bay [Refuge], place it either just inside the front gate near the existing building or near the existing public parking lot, but do not destroy habitat on the ridge over Marumsco Creek to build a new facility.”

Another respondent wrote that it would be advantageous to coordinate joint use of a visitor center with Northern Virginia Park Authority and the Commonwealth of Virginia. They stated, “Early in this draft are found references to consolidating refuge lands on Mason Neck as well as the building of a new headquarters/visitor center at Occoquan Bay. In a further effort to secure facilities and rationalize refuge borders, I suggest there is merit in consulting not only with the Northern Virginia Regional Park Authority but with the Commonwealth of Virginia on possible joint use of the visitor center at Mason Neck State Park and transfer to USFWS of certain other park elements, including the Jammes property.”

Response: The decision to develop a new headquarters and visitor center on Occoquan Bay Refuge is incorporated by reference into this CCP. In chapter 3 for Mason Neck Refuge, under “Actions Common to All Mason Neck Refuge Alternatives,” we discuss the building of a new refuge headquarters and visitor center. A separate EA was distributed for public review and comment in 2009. The former Regional Director made a determination that the EA sufficiently evaluated a reasonable range of alternatives and he approved the proposed location on Occoquan Bay Refuge. We did not readdress this decision in the draft CCP/EA for Mason Neck and Featherstone Refuges.

With regards to acquiring State Park property or sharing their visitor facility, please see our response under, **“Refuge Establishment and Land Acquisition History.”**

Comment: One commenter wanted paved trails constructed and another commenter encouraged the Service to use low-impact development techniques, natural landscaping, native plants, LEEDS (Leadership in Energy and Environmental Design)-certified green buildings, and to avoid increasing impervious surfaces. Similarly, another commenter wanted the FWS to utilize trails and infrastructure that maximized passive wildlife-related recreation.

Response: We agree that new developments on the refuge should be low-impact and designed to maximize green infrastructure and technology and we are committed to the use of those practices. Evidence of our commitment to constructing green buildings in the Northeast Region can be found at: <http://www.fws.gov/northeast/climatechange/stories/greenbuildings.html> (accessed June 2011).

With regards to the trail surfaces, we would plan to build only what is necessary to safely accommodate the type and volume of traffic we anticipate while protecting the refuges’ resources. The high volume, multi-purpose trails (High Point Trail on Mason Neck Refuge and the proposed segment of the Potomac Heritage National Scenic Trail on Featherstone Refuge) will have hardened, smooth surfaces for concurrent, safe use by pedestrians and non-motorized, wheeled transport, such as wheelchairs and bicycles. Other trails on the refuges would have more permeable surfaces, such as dirt or stone dust, to minimize impacts on natural resources. We also point out that all the proposed new trails will be built in existing disturbed areas, such as old dirt roads or footpaths.

Throughout chapter 4 of the draft CCP/EA, we identify low-impact construction measures and energy efficient practices we will implement to minimize impacts to resources. Under the heading “Soils,” we identify how we would use best management practices during construction and maintenance activities to ensure that we maintain soil productivity. Specifically, we state, “Site conditions, including soil composition, condition, and hydrology will be the ultimate determinant of what management actions can occur on any particular site on the refuges. No site would be managed in a manner that permanently degrades site conditions.”

Under the heading “Water Quality, Wetlands, and Aquatic Biota Impacts,” we state how we will minimize the effects on those resources by locating infrastructure away from streams, rivers, or other wetlands, routinely monitoring roads and trails for damage and remediating any problems encountered, and being vigilant during maintenance and construction activities to watch for damage and prevent it. We also state in this section, under alternative B, “Proper site preparation and use of standard mitigation practices, such as silt fences, would be implemented and further limit any potential for impacts.”

In chapter 4, under the heading “Air Quality Impacts That Would Not Vary by Alternative,” we state, “...we would reduce [air quality] impacts through the use of energy efficient systems and vehicles. We have already implemented actions such as installing fluorescent lighting, motion-activated night lighting, and low-emittance glass windows. These windows reduce the ultraviolet radiation factor by suppressing radiative heat flow, as well as fluorescent lighting, and motion-activated night lighting. We use “green” bio-degradable solvents whenever feasible. We have also achieved a 60-percent level of recycling of materials on the Refuge Complex.”

Comment: VDGIF wrote, “We support the expansion of wildlife viewing, wildlife photography, and interpretive programs on the [Mason Neck] Refuge. However, we would like to see additional opportunities such as installation of observation platforms and interpretive signage included in the Preferred Alternative. Because there is great demand among our constituents for additional wildlife viewing opportunities, we are supportive of additional opportunities for such activities at Mason Neck [Refuge]. VDGIF would be happy to assist the USFWS in those efforts.”

Response: Our proposal includes a level of infrastructure development that we believe is commensurate with the predicted availability of resources to construct and maintain structures and demand. We have intentionally limited the level of development on the refuge to minimize impacts on wildlife and to offer a more natural outdoor experience where visitors are immersed in nature. We encourage those visitors interested in a more developed and structured environment to visit Mason Neck State Park.

However, we do propose maintaining and constructing some facilities to orient visitors, provide information about the refuge’s wildlife and natural resources, and offer self-guided opportunities. Under alternative B for Mason Neck Refuge, goal 4, objective 4.3 “Wildlife Observation and Photography,” we propose that all of our trails, existing and proposed, will have at least one viewing platform and at least one information kiosk at each trailhead. Those same proposals are in our final CCP (maps 4.1 and 4.2 in the final CCP show existing and proposed public use features at Mason Neck Refuge). Several will also have interpretive signage along the trail to offer self-guided interpretive opportunities. We plan to work more closely with Mason Neck State Park to offer interpretive programming. Under alternative B for Featherstone Refuge, goal 2, objectives 2.3-2.5, we propose infrastructure such as fishing and viewing platforms. Again, these proposed platforms are in our final CCP (map 4.3 in the final CCP shows proposed public features at Featherstone Refuge).

We look forward to the support of VDGIF in implementing our wildlife observation, nature photography, and interpretive programs.

Education and Community Outreach

(Letter ID#: 40, 58, 69, 71)

Comment: Five people responded that the refuges should enhance efforts in environmental education. The Fairfax County SWPD offered several specific suggestions including the following:

- Exploring all opportunities for collaborative public outreach and environmental education with partners in Fairfax County, Virginia
- Collaborating with the SWPD to distribute a variety of environmental outreach information and materials from their extensive library

- Using the SWPD “We All Live Downstream” activity books and the “Stormy the Raindrop” coloring books to help education young readers about stormwater, watersheds, and aquatic wildlife
- Working with SWPD and Fairfax County Public Schools to develop a combined curriculum to include a field trip to the refuge as part of the schools’ “Virginia Ecosystems” unit

Response: We also recognize the value of developing a high quality environmental education program. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, goal 3, objective 3.6 “Environmental Education Programs,” we propose to rehabilitate our outdoor education facilities and increase education partnerships and educator-led programming. With additional staffing, we would, “be more proactive in developing a core environmental education program in conjunction with the facilities and programs of Mason Neck State Park, as well as through rehabilitation of our own educational facilities on Sycamore Road.” We list strategies that we would continue to implement, as well as identify additional strategies to implement over the next 15 years in support of an environmental education program. SWPD offers some great suggestions as we develop our future program. The draft CCP/EA, chapter 3 for Featherstone Refuge, goal 2, objective 2.6 “Environmental Education,” states that we rely more on partner-led environmental education opportunities because of limited resources and less capacity.

Biological Resources

Biological Resources – General

(Letter ID#: 7, 14, 15, 25, 39, 69)

Comment: Comments placed in this category were very general concerning the refuges’ natural resources and protecting them. One person listed a variety of threats to local natural resources, such as loss of wetlands and poor regional air and water quality. VDEQ submitted comments stating that the VDCR had jurisdiction and would make specific biological comments. Those comments listed the following natural heritage resources of concern with descriptions of each: bald eagle, fine-lined emerald dragonfly, Parkers pipewort, small whorled pogonia, sensitive joint-vetch, river bulrush, and rare skipper butterfly. VDEQ also requested we coordinate with VNHP for information updates and to share any survey results. The VNPS also listed general descriptions of several rare plants and expressed their concern with protecting them. On Featherstone Refuge, the VNPS specifically mentions an interest in protecting State rare species such as river bulrush, Virginia day flower, and pitch pine. One respondent identified an interest in spotted salamander. Another respondent included a list of local threats and degrading influences to natural resources in Fairfax County, Virginia.

Response: We share the desire to actively conserve rare plants and wildlife, wetlands, and to address the threats affecting these and other natural resources. Addressing these conservation concerns is one of the purposes of, and a stated need for, developing a CCP. We appreciate the additional species information provided to us and have included it in the final CCP, Chapter 3 “Refuge and Resource Descriptions.” We will also obtain updated resource information from VNHP and share our survey results.

With regards to concerns about water quality and wetlands, please see our responses under, “**Hydrology and Water Quality**” and “**Freshwater Wetland Habitat.**”

Comment: VDGIF wrote in support of our proposed management for bald eagles, waterfowl, migratory birds, aquatic resources, and other native wildlife under the Service-preferred alternative B for both refuges.

Response: We thank VDGIF for their support and look forward to continuing our valuable partnership.

Freshwater Wetland Habitat

(Letter ID#: 7, 39, 49, 69)

Comment: The VDEQ submitted the applicable regulations and agency jurisdictions for wetlands and subaqueous lands. Several people expressed that wetlands must be protected. One commenter also wanted to make sure that refuge wetlands stay as wetlands and are not converted to hardwood forest habitat. VDGIF also wrote in support of our proposed management of aquatic and marsh habitats under the Service-preferred alternatives for both refuges.

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges, including those regarding wetlands protection.

We concur that protecting existing wetlands should be a priority on refuges, and we developed a goal and several objectives in the draft CCP/EA to that effect. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, goal 2, objectives 2.1 to 2.4, and in chapter 3 for Featherstone Refuge, goal 1, objective 1.2, we describe our proposal to protect and enhance existing wetlands. Nowhere do we propose converting wetlands to forest habitat. In chapter 4 for both Mason Neck and Featherstone Refuges, under headings for “Water Quality, Wetlands, and Aquatic Biota Impacts,” we describe how other CCP actions might affect those resources.

Invasive Species and Pests

(Letter ID#: 15, 16, 30, 39, 40, 61, 69)

Comment: Seven respondents favored removing and controlling invasive and pest species, including comments on controlling mute swans, resident Canada geese, and emerald ash borer.

Response: We concur that controlling invasive species is critically important to maintaining the health, integrity, and diversity of refuge resources. The level of importance for control efforts is reflected in the fact that those actions are identified in the draft CCP/EA, chapter 3, in the sections “Actions Common to all Mason Neck Refuge CCP Alternatives” and “Actions Common to Both Featherstone Refuge CCP Alternatives.” Discussion on control measures for invasive plants and pest animals and insects, including mute swans and resident Canada geese, are specifically mentioned.

Threatened and Endangered Species

(Letter ID#: 7)

Comment: The VDEQ was the only commenter to address threatened and endangered species. They wrote that surveys for the federally listed small whorled pogonia and sensitive joint-vetch should be coordinated between the Service and the Virginia DCR Natural Heritage Program (VNHP). If the plants are found to be present on the refuges and there is a likelihood of negative impacts to the species, they recommend coordinating with the VDACS to ensure compliance with Virginia’s Endangered Plant and Insect Species Act.

Response: We take seriously our responsibility to protect federally listed species. We acknowledge in the draft CCP/EA, chapter 3 for Mason Neck Refuge, in “Actions Common to All Mason Neck CCP Alternatives,” and in “Actions Common to Both Featherstone CCP Alternatives,” the potential for these plants to occur on the refuges and our commitment to survey for them before conducting any ground disturbing activities. Presently, we have no documented occurrences. Since release of the draft CCP/EA, we enlisted the assistance of the VNPS to begin surveys for these and other rare plants with priority given to surveying where high probability habitat areas coincide with existing or proposed visitor access areas. We will coordinate our plans with Virginia DCR DNH and share the results to date.

Inventories and Surveys

(Letter ID#: 7, 13, 14, 15, 18, 25, 39, 40, 48, 57, 67, 71, 79)

Comment: Several commenters called for increased resource surveys, and specifically mentioned the need to complete full vegetative, invasive plant and animal, and deer browse inventories and surveys. One person urged us "...to conduct complete assessment of the health of all the habitats on the refuges." Many views are reflected in a comment we received about the need for baseline surveys at Featherstone Refuge and the importance of enlisting volunteers to help. The comment reads,

A formal vegetation survey of the refuge has not been done by the FWS. We believe that as part of opening the Featherstone National Wildlife Refuge to the public, volunteers can help conduct surveys of the plants and plant communities found there. This will help refuge staff and others better understand the resources onsite, make decisions on how to manage them, and guide human activities to avoid impacting sensitive plants and ecosystems. The plant surveys will also supply much needed information on the presence and location of non-native invasive plant species which can harm native plants and greatly reduce the value of the habitat for animal species. We also believe a deer browse survey should be done and appropriate deer management implemented to reduce the impact of deer browse and promote the health of native plant communities.

Response: We fully agree that collecting more baseline resource information would be hugely beneficial to support future refuge management decisions, especially as we respond to climate change impacts. In the past, staffing, funding, and the availability of other resources have all hampered our ability to implement an intensive program.

The draft CCP/EA acknowledges the importance of research, resource inventories, and monitoring in many places. In chapter 3 for Mason Neck Refuge, all of the biological objectives under alternative B goals 1 and 2 include specific strategies for conducting various resource inventories and surveys, in addition to listing monitoring elements to implement. In chapter 3 for Featherstone Refuge, all of the biological objectives under goal 1 identify similar strategies. Also in chapter 3, under the sections "Actions Common to all Mason Neck Refuge CCP Alternatives" and "Actions Common to Both Featherstone Refuge CCP Alternatives," we identify the need to complete an Inventory and Monitoring Plan, which is a required refuge-specific step-down plan.

During development of the CCP, we continued to make progress in improving our information base through the use of partnerships and the dedicated efforts of our Friends Group and volunteers. In the draft CCP/EA, chapter 2, under our resource narratives for Mason Neck and Featherstone Refuges, respectively, we describe surveys that we have conducted over the years in partnership with others. For example, we describe our annual coordination with VDGIF to conduct breeding and wintering bald eagle and wintering waterfowl surveys, and deer density and population assessments. We have continued our annual inspections for invasive plants. In addition, the Forest Health and Condition Inventory and Assessment conducted by the Virginia Department of Forestry in 2009 on Mason Neck Refuge provided us with important information on the condition of our forests. Also, as noted above in our response under the heading "**Threatened and Endangered Species,**" we recently enlisted the assistance of the VNPS to begin surveys for rare plants. We recognize, however, that this does not fully address the commenters request for a "formal" vegetative survey of the refuges.

Once the CCP is approved, we will look forward to pursuing opportunities to work with partners and volunteers with expertise in resource inventorying and monitoring to assist us in reaching our goals and objectives.

Comment: One person noted that the bird and invertebrate lists for the refuges were lacking some species seen on and known to be on the refuges. They attached documents containing current species lists of birds, butterflies, and dragonflies on the refuges.

Response: We thank this respondent for providing us with information we did not have at the time of publishing the draft CCP/EA. We have edited our lists of amphibians and reptiles (tables A.2 and A.7) in appendix A in the final CCP to reflect the information provided. We have added two additional lists representing butterfly and dragonfly species (tables A.11 and A.12) suspected to occur on the refuges. We also clarify that the bird lists (tables A.1 and A.6) in appendix A are not intended to be an exhaustive list of all the species that may occur on the refuges. These lists only represent bird species that are considered to be of elevated conservation concern in the region.

Comment: A commenter wanted the refuges to “...conduct wetland analysis and enhancement to benefit wintering and migratory waterfowl.” Another individual wanted us to “...institute and maintain baseline studies of water and soil quality...”

Another respondent specifically wanted the Service to address the need to conduct biological monitoring on the refuges: “Objective 2-4 of the EA states that the FWS intends to ‘obtain baseline information of fish species diversity and species health in order to evaluate impacts of tidal marsh water quality changes.’ However, the refuge currently lacks the ability to conduct biological monitoring due to a lack of staff biologists. Previous assessments conducted by SWPD indicated that Kane Creek is a high-quality stream ecosystem; sites in the watershed have been used by the County to develop reference conditions to which other Coastal Plain streams in the county were compared. SWPD staff would be willing to offer assistance to the Service and its partners in biological monitoring and assessment of Kane Creek as well as Mason Neck’s other aquatic ecosystems, and in developing and interpreting indicators of environmental integrity. Biological monitoring could also provide documentation of aquatic invasive species such as the rusty crayfish, Northern snake head etc.”

Fairfax County encouraged the Service to conduct inventories and baseline surveys: “Staff recommends that the draft CCP be enhanced with the inclusion of inventory plant communities on [Mason Neck Refuge]. Such inventories would establish a baseline and support other management objectives for the refuge. Staff supports FWS efforts to inventory and control non-native invasive plant species as well as to control resident Canada goose and white tail deer populations.”

Response: Our response to these comments is similar to what we stated above in our first response under “**Inventories and Surveys.**” In summary, we recognize the importance of all of the surveys mentioned and look forward to developing our Inventory and Monitoring step-down plan to help identify and prioritize activities. In the meantime, we look forward to working with the SWPD and other partners, our Friends Group, and volunteers to conduct inventory and monitoring activities of mutual interest and benefit.

Comment: The VDEQ listed the applicable regulations and suggestions for needed surveys.

Response: We will continue to coordinate with the VDEQ, and other respective State agencies, to comply with all applicable State laws and regulations, and obtain all necessary permits, required on national wildlife refuges.

Migratory Birds

(Letter ID#: 39, 40, 47)

Comment: One respondent representing the ASNV wanted the refuges to focus on conserving habitat for bird species. The comment states that declining trends in several bird species “point to the critical importance of strong conservation, restoration and stewardship of our refuge resources that provide habitat for birds. For example, most of the eastern United States’ woodlands have been destroyed or compromised, a fact that makes the refuge’s forests are especially critical.” Another person wanted Mason Neck Refuge to undertake healthy forest management to benefit neotropical migratory birds.

Another person specifically commented on the lack of information on the effects of natural predators on migratory birds in the draft CCP/EA and would like to see the refuge gather information on these impacts.

Response: Migratory birds are protected under the Migratory Bird Treaty Act (MBTA) and, therefore, are a Federal trust resource. Their protection, and the conservation of their habitat, is of paramount importance to achieving the mission of the Refuge System, and refuge purposes and goals. We share the concern that the Audubon Society and others have with the declining trends in many bird species, often attributable to habitat destruction or human induced impacts that affect the diversity, integrity, and environmental health of the region’s forests.

In the draft CCP/EA, we emphasize the important contribution that the refuges make to resident and migratory birds dependent on forested and wetlands habitats. In chapter 3 for Mason Neck Refuge, under “Actions Common to All Mason Neck Refuge CCP Alternatives,” we list “Managing Forest Health and Condition” as a priority for management regardless of the alternatives implemented and describe in this section the measures we would take to control invasive species. During development of the CCP, our elevated concern with forest health motivated us to enlist the assistance of the Virginia Department of Forestry. They conducted field surveys and prepared a 2009 report titled, “Forest Health and Condition Inventory and Assessment for Mason Neck Refuge,” which we used to develop objectives and strategies for management. That report is available from refuge headquarters.

In addition, in chapter 3 for Mason Neck Refuge, goal 1, objectives 1.1, 1.2, and 1.3 specifically relate the importance of protecting and conserving forested habitat for bald eagles, migratory forest-dependent birds, and great blue herons. Goal 2 for Mason Neck Refuge, objectives 2.1 and 2.2 relate the importance of protecting the refuge’s wetlands for birds such as waterfowl, wading birds, and other migratory birds. Under all of these objectives, we detail actions we will undertake to benefit those resources over the long term. Similarly, in chapter 3 for Featherstone Refuge, goal 1, objective 1.1 relates that refuge’s importance to migratory birds, and identifies the measures we will undertake to benefit them over the long term.

With regard to the comment on natural predators of migratory birds, it is true we did not discuss this topic specifically in the draft CCP/EA. Owls, hawks, eagles, cowbirds, blue jays, crows, snakes, fox, raccoons, skunks, and mink and other weasels are all known natural predators to birds and bird eggs on the refuge. However, with regard to this comment, we are unsure what specifically the commenter would like us to address. We are not aware of any predatory impacts on migratory bird populations on the refuge outside of the natural range of variation. In addition, the impacts to populations from predators will vary greatly between individual bird species, which is a level of analysis and detail beyond the scope of this draft CCP/EA. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under goal 1, objective 1.2 “Mature Hardwood-mixed Forest – Migrating Forest Dependent Birds,” we mention a strategy to continue our support for two project sites in the Monitoring Avian Productivity and Survivorship Program (MAPS). The MAPS Program comprises a continentwide network of hundreds of constant-effort mist netting stations. Analyses of the resulting banding data provide critical information relating to the ecology, conservation, and management of North American landbird populations, and the factors responsible for changes in their populations. We encourage people to access the program’s Web site at: <http://www.birdpop.org/maps.htm> (accessed June 2011). There is a wealth of additional information on this topic. If there is a particular species of interest on the refuge, we encourage the respondent to contact refuge headquarters for additional information.

Bald Eagle

(Letter ID#: 9, 19, 39, 69)

Comment: Four respondents commented on our proposals for bald eagle conservation.

The VDGIF stated that they would fully support and work with the refuges to achieve the goal of meeting or exceeding bald eagle protection guidelines.

Two respondents pointed out that Mason Neck Refuge was established specifically to protect bald eagles, and urged the refuge to enhance their conservation of bald eagles through increasing shoreline protection, improving water quality, restricting public access to sensitive areas, ensuring adequate fish populations, and providing nesting, roosting, and foraging habitat.

Conversely, another person felt that bald eagles were rebounding in the area and that refuge staff time and effort should be spent elsewhere: “My observations - through regular year-round visits to the Mason Neck State Park and National Wildlife Refuge and surrounding waters, and those of the bird watching community, have witnessed a steady increase in the number of bald eagles utilizing the surrounding habitat. In addition, vast areas up and down the Potomac waterway support large populations of eagles (and other raptor species) in their current state. Given these factors, I feel there is not an adequate threat to support valuable budget dollars on trying to fix something that is not broken.”

Response: In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under alternative B, goal 1, objective 1.1 “Mature Hardwood-mixed Forest–Bald Eagles,” we identify our proposed conservation measures for the bald eagle in the mature hardwood-mixed forest on the refuge. In our rationale for that objective, we acknowledge the remarkable recovery of this bird and its removal from the Federal list of threatened and endangered species. However, we also point out that sustaining those gains is based on the continued maintenance and protection of quality bald eagle habitat throughout its range. Further, we highlight that even though the bald eagle is no longer federally listed, the species continues to be protected by both the MBTA and Bald and Golden Eagle Protection Act and, therefore, is a Federal trust resource. The bald eagle is also State-listed as threatened in Virginia. This, combined with the fact that protecting the bald eagle was one of the primary purposes for establishing Mason Neck Refuge, supports the actions we propose on its behalf.

Deer

(Letter ID#: 15, 16, 22, 39)

Comment: Within this category are a group of comments dealing with the need for deer management to protect the health of the forest and reduce overbrowsing. One commenter shared their observations about the condition of the forest within and outside a deer enclosure on Mason Neck Refuge, and suggested it was a good education tool. Some, but not all commenters, mentioned hunting as a specific deer population control tool. Three comments favored increasing management of the deer population to reduce overbrowsing of native vegetation. One person stated that Mason Neck Refuge’s current hunting season was not sufficiently addressing the deer overpopulation problem and other management techniques were needed: “I would like to see the forest undergrowth returned to a reasonable level. The still large deer population is still foraging on the small pines needed in the future for [bald eagle] nesting...I believe the deer population which still looks unhealthy needs to be brought down to a healthy level.”

Response: We appreciate, and fully agree with, the concerns expressed with overabundant deer populations affecting forest understory. We describe the problem in the draft CCP/EA, chapter 1, under “Issues, Concerns, and Opportunities” for both refuges, and in chapter 2 for Mason Neck Refuge, under the heading “Mammals.” An important point we make is that the deer on the refuge are not an isolated population, and we cannot effectively control deer numbers over the long term unless there is a coordinated effort across ownerships on Mason Neck Peninsula.

Nevertheless, active deer management, through a public hunt on Mason Neck Refuge is a high priority for us each year and helps reduce the deer population for the short term. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under alternative B, goal 3, objective 3.1 “Deer Hunting,” we propose to continue our annual public hunt, in coordination with VDGIF and Mason Neck State Park, with some enhancements to increase deer control reflected in our strategies. Some of those strategies include encouraging and supporting a deer hunt on other public lands on Mason Neck Peninsula, and working with partners to annually evaluate whether to increase the length of the season, increase the number of hunters, or distribute hunters differently. Also, we propose consideration of an archery deer hunt in the future as another tool.

In partnership with VDGIF and Mason Neck State Park, we believe implementing a hunt program is the most effective tool we have available at present to manage deer given our combined resources. We will adapt management, as warranted, in response to increases or declines in the regional deer population.

Waterfowl

(Letter ID#: 19)

Comment: One respondent wrote about the refuge’s proposed waterfowl management program. The commenter wrote, “Alternatives B and C include improvement of wintering waterfowl and other migratory bird habitat. The current habitat in the area currently supports some the largest numbers of migrating waterfowl in recent history. Thousands of wintering waterfowl, and other migratory birds, utilize the existing wetlands and tidal creeks and bays surrounding the area that provide abundant sub-aquatic vegetation (SAV) to support these populations. I do believe the health of these habitats to be critical to overall health of the ecosystem and migratory waterfowl

and I encourage the Mason Neck and Featherstone National Wildlife Refuge management and administrators to continue to expend budgetary funds for monitoring at the current levels and leverage partner program assistance to the maximum extent.” The respondent was also concerned about allowing waterfowl hunting on the refuges, writing “the introduction of a public waterfowl hunting program on the shorelines of Mason Neck and Featherstone Refuges is inviting a host of potential problems as a result of misuse that are counterintuitive to habitat preservation and enhancement activities.”

Response: We agree with the comment about the importance of the refuges to regional wintering waterfowl and that protecting the integrity of the refuge’s wetlands is critical to providing quality waterfowl habitat. We acknowledge this importance to waterfowl in our proposal in the draft CCP/EA, chapter 3 for Mason Neck Refuge, under goal 2 and its objectives 2.1 to 2.4 that relate to conserving and protecting the health, diversity, and integrity of wetlands, protecting the shoreline, and improving water quality.

With regard to the comment on waterfowl hunting, we refer to our response under “**Hunting - Waterfowl and Hunting Blinds**” below.

Public Access and Use

Public Access and Public Use – General

(Letter ID#: 7, 8, 17, 39, 72)

Comment: The VDEQ commented on which State agency has jurisdiction and regulations regarding public access and use, and specifically mention that our visitor service’s program proposals support priorities of the VDCR, Department of Planning and Recreational Resources. Their letter also included comments that Prince William County is committed to securing public parking and safe and legal public access to Featherstone Refuge and working with stakeholders regarding the Potomac Heritage National Scenic Trail (PHNST).

Response: We appreciate the State’s support of our visitor services programs. We will continue to coordinate with the VDCR, Prince William County, and other respective State and county agencies, to implement mutually beneficial goals. Also, see our responses below under the heading “**Specific Trails and Areas.**”

Comment: One respondent was concerned that care be taken that planned trails are constructed with limited or no erosion and that no vehicles other than staff or emergency vehicles be allowed on the refuges. Another person was concerned with the fragile natural resources on the refuges, and urged refuge staff to only allow passive recreational activities on the refuges.

Response: We are also concerned with the sensitive placement of new refuge infrastructure, including trails. Please see our response above under the heading “**Infrastructure.**”

Comment: Another wrote us to clarify his understanding that research would be allowed regardless of the alternatives selected, including under Alternative A “Current Management.” He referred to an article that he felt misrepresented research opportunities as it indicated research activities would not be allowed unless the refuge was opened up to public use and access.

Response: Research is currently allowed on both refuges after the refuge manager completes a finding of appropriateness and a compatibility determination, and issues a special use permit, as warranted. This is proposed under all alternatives. In the draft CCP/EA, chapter 3, in the sections “Actions Common to All Mason Neck CCP Alternatives” and “Actions Common to Both Featherstone Refuge CCP Alternatives,” we include a discussion on “Supporting Research and Investigations.” In addition, appendix B “Findings of Appropriateness and Compatibility Determinations,” includes a finding of appropriateness and compatibility determination for research, including inventories and monitoring.

Comment: One person wanted refuge staff to allow kayak and canoe access and consider constructing landing areas. He stated, “I don’t see any consideration for access to the refuges for kayakers or canoe enthusiasts, despite being adjacent to the Occoquan Water Trail and Leesylvania and Mason Neck State Parks. I request that a landing area be added to the public use options for both refuges. These could be seasonal if not year round and would boost ecotourism and environmental education.”

Response: We describe why we do not allow shoreline access on Mason Neck Refuge in several places in the draft CCP/EA. First, it is mentioned in chapter 2, under “Mason Neck Refuge Environment,” under the section “Visitor Services.” Next, it is mentioned in Chapter 3 “Actions Common to All Mason Neck Alternatives,” in the section on “Continuing a Fishing Closure at Mason Neck.” Finally, it is mentioned in chapter 4, under “Impacts on or Between Refuge Users.” With regards to Featherstone Refuge, the final CCP includes our plans to allow non-motorized boat access in one designated location along Farm Creek. Please see our discussion above under the heading “**Introduction**,” item #1 in our list of changes and clarifications that we made for the final CCP.

Specific Trails and Areas

(Letter ID#: 6, 9, 26, 40, 55, 70, 76, 77)

Comment: The PHNST and Captain John Smith Trails were specifically mentioned by respondents. An additional comment was specifically about access to Great Marsh on Mason Neck Refuge, and another mentioned the High Point Trail on Mason Neck Refuge. Also, please refer to the section below, “**Opening Featherstone Refuge to Public Access**” for more comments on providing public access to Featherstone Refuge.

An elected official, county officials, and several citizens expressed their desire to see the PHNST segment on Featherstone Refuge completed and open to the public. Congressman Connolly wrote, “...I strongly urge you to prioritize completion of the Potomac Heritage National Scenic Trail in both Featherstone and Occoquan Bay Refuges as part of the CCP.” Examples of representative comments are presented below.

Prince William County officials commented on the PHNST writing, “As identified in Alternative B, Prince William County is committed to working with the U.S. Fish and Wildlife Service to pursue and evaluate options to secure public parking and safe and legal public access to the refuge. The County is also committed to working with stakeholders to design and construct the PHNST through the Refuge. The PHNST is of national importance and the County is committed to completing its portion of the trail through its leadership and funding. Once public access has been established, the County hopes to maintain an open and supportive relationship to identify and resolve issues and to take advantage of opportunities as they arise. The Prince William County Park Authority, which is the lead agency for the County’s portion of the Potomac Heritage National Scenic Trail, the Trails and Blueways Council, a citizen’s advisory group appointed by the Board of County Supervisors, and the Park Authority Board, have all voiced their support for Alternative B. The portion of the PHNST that will traverse the Refuge is a critical component of the County’s Trails Plan. The County, the Park Authority and the Trails and Blueways Council urge the U.S. Fish and Wildlife Service to follow approval of the Comprehensive Conservation Plan with timely implementation of the recommendations in Alternative B to speed completion of the PHNST.”

A representative from the Prince William Trails and Blue Ways Council expressed the council’s “firm support” for completing the segment of the PHNST on Featherstone Refuge. They also shared their opinion that, “We also believe that it should not be dependent upon the perfect [conditions]...and it’s our belief that it should be opened as soon as possible....we’re so blessed in Prince William County that they have a number of volunteer organizations to help with...the implementation of [the PHNST].”

An individual wrote, “I would like use of the Featherstone Refuge. I would like to see the Potomac Heritage Trail have more work done to it and I think it would be great to connect the trail thru Featherstone. As a runner it is difficult to find a safe trail in the area away from the roads and this would be a great opportunity to start moving forward on the plan as intended.” Another individual suggested we, “Integrate [the PHNST] with the Virginia Birding and Wildlife Trail [new for Featherstone].”

One person representing The Audubon Society said, “In coordinating with the National Park Service to manage the Captain John Smith Trail, we urge you to not create extensive shoreline visitor service infrastructure that would displace native habitats and wildlife or cultural resources.”

Another person wrote us with a request to specifically allow greater access to Great Marsh on Mason Neck Refuge. Their comment was, “I believe that one of the greatest assets of the [Mason Neck Refuge] is the Great Marsh. Once a fishery of George Mason, I believe some limited access via special tours by boat for legislators or historians should be provided or allowed. This area is too precious to simply leave out of the public access equation and one of the most beautiful and historic areas of the refuge...”

One person wrote us to suggest that the community proposal to develop an extension of the High Point Trail along Gunston Road to terminate at Great Marsh Trail head should be a priority.

Response: We are impressed with the strong support for the PHNST, in particular, the segment that is proposed through Featherstone Refuge. In the draft CCP/EA, chapter 3 for Featherstone Refuge, under alternative B goal 2, objective 2.1 “Public Access,” we indicate our intent to continue discussions with Prince William County, the National Park Service, and other stakeholders for viable options for resolving the public access issue to the refuge and establishing the trail.

With regards to developing visitor access points along either refuge shoreline, we do not believe that what we have proposed in the draft CCP/EA is “extensive” or excessive. In chapter 3 for Mason Neck Refuge, under alternative B goal 3, objective 3.4 “Wildlife Observation and Photography,” we indicate only one observation platform is proposed for the shoreline at Sycamore Point. Map 3.1 in the draft CCP/EA shows this graphically. We also stipulate in the rationale for the objective that the platform and trail access would only be built if field surveys indicate resource impacts, in particular on cultural resources, would be minimal or avoided entirely. This stipulation would also hold true for the infrastructure we have proposed in the draft CCP/EA, chapter 3 for Featherstone Refuge, goal 2, objective 2.1 “Public Access,” and displayed graphically on map 3.3. Appendix B includes a compatibility determination for “Wildlife Observation, Photography, Environmental Education, and Interpretation,” which concludes that the visitor infrastructure proposed does not interfere with, or detract from, achieving refuge purposes or the mission of the Refuge System.

In response to the comment about providing greater access to Great Marsh, we discuss in the draft CCP/EA, chapter 2 for Mason Neck Refuge, under the heading “Visitor Services,” that virtually all of the refuge shoreline is closed to public access due to concerns with wildlife disturbance or impacts to sensitive habitat areas. A Directors Order in 1969 specifically closed Great Marsh to hunting in order to protect breeding and wintering bald eagles and wintering waterfowl. However, there are two observation platforms that offer sweeping views of Great Marsh. One is at the end of the 0.75-mile Joseph V. Gartlan, Jr. Great Marsh Trail and the other is along Woodmarsh Trail. Both of these trails would continue to remain open under our proposed alternative B.

In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under alternative B goal 2, objective 2.1 “Great Marsh,” we describe Great Marsh’s regional importance year round to wildlife which, in part, is due to the sanctuary it provides with limited public access and potential for human disturbance. We believe our proposal under alternative B, objective 2.1, to continue to prohibit public access to Great Marsh, both on foot and by boat, is necessary to achieve refuge purposes for protecting species of conservation concern.

With regard to the comment about the community proposal for an extension of the High Point Trail along Gunston Road to the Great Marsh Trailhead, we express our concerns in the draft CCP/EA, in chapter 3 for Mason Neck Refuge, under “Actions Considered, but Not Fully Developed,” and explain our reasons for not evaluating this proposal in detail. No new information has surfaced for us to change our position, and so we have no plans to pursue further.

Hunting – General

(Letter ID#: 1, 6, 8, 19, 24, 29, 30, 37, 42, 68, 69)

Comment: Thirteen people responded with general comments about hunting. Sentiments were nearly evenly divided with approximately one half of the comments in favor of hunting and the other half against hunting. Of those opposed to hunting, several felt it was a human safety issue. One such comment stated, “Proposing recreational hunting in a wildlife preserve in a highly populated area like Mason Neck is not consistent with public safety and proposing hunting of turkeys by children is going beyond the pale.” Another commenter

urged refuge staff to not allow any type of hunting on Featherstone Refuge: “[Featherstone Refuge] is a very narrow refuge and not much room between the [the railroad] tracks [and] the water...please consider these serious points.” One comment was specifically about the proposal for an archery deer hunt. The commenter was concerned that there would be user conflicts between hunters and non-hunting visitors because the archery hunt would occur during the fall when refuge visitation is high. They expressed concern that “...development of an archery season could propose some significant risk and conflict...the use of trails and paths are likely to see some of the highest traffic during these months...having to close the area to the majority of visitors to allow hunting, not including the expenses associated with it, is not the best utilization of money or facilities.” One other respondent felt any type of hunting was immoral and unethical, while another commenter felt there were ethical issues specifically with archery hunting, writing, “...archery is difficult sport to master. Many deer each year are wounded [by archers] and often take days to expire.”

Further, one respondent felt that there were ample hunting opportunities in other areas off refuge lands, and that limited refuge resources should be devoted to other programs. Finally, three other comments opposed to hunting on the refuges were concerned about the impact of hunting on non-target wildlife resources. In particular, one respondent was concerned about the potential for hunting to disturb bald eagles and over-wintering ducks in Great Marsh.

On the other hand, there were several commenters in support of hunting in general. Two of those respondents wrote about the “heritage” of hunting, while another felt hunting is an important wildlife management tool. Another specifically mentioned “Executive Order 13443” which encourages refuges to offer hunting opportunities.

Response: Hunting is identified as one of six priority public uses for national wildlife refuges under the 1997 Refuge Improvement Act and Service policy (605 FW 2). Our mandate is to provide for those uses when they are compatible with refuge purposes, goals, and other management priorities. In addition, there is a Presidential Executive Order that supports hunting. We referenced Presidential Executive Order #13443 – “Facilitation of Hunting Heritage and Wildlife Conservation” in the draft CCP/EA, chapter 3, Mason Neck Refuge, alternative B, goal 3, objective 3.1 “Deer Hunting.” In addition, under the rationale for this objective, we describe how deer hunting accomplishes a vitally important role in keeping the deer population within the carrying capacity of the habitat. This is a major concern on Mason Neck Refuge where deer overbrowsing is impacting the health, integrity, and diversity of the forest.

We have been conducting a quality deer hunt on Mason Neck Refuge for over a decade and have not documented the concerns expressed in the comments related to safety, impacts on non-target species, including concerns with disturbing bald eagles and waterfowl. We specifically design our hunt, in cooperation with State and other partners, to be safe and consistent with the Service’s guiding principles for a hunt program, which we describe under objective 3.1. Our program is very popular. Our success notwithstanding, we propose some enhancements to our deer hunt program under objective 3.1, and a new youth turkey hunt under objective 3.2. We provide responses to comments on those specific programs under the respective headings for “**Hunting – Youth Turkey Hunt,**” and “**Hunting - Deer,**” below. We believe the impacts analysis we conducted in chapter 4 of the draft CCP/EA supports our recommendations for an enhanced and expanded hunt program on Mason Neck Refuge.

For Featherstone Refuge, in chapter 3, goal 2, objective 2.2, we acknowledge interest in allowing hunting on this refuge. However, our proposal under objective 2.2 is to conduct a more detailed evaluation of possible hunting alternatives when we have additional staff in place, and include additional public involvement in that evaluation, before we develop a specific program. Considerations like those raised in the comments above would be part of the analysis.

Hunting – Youth Turkey Hunt

(Letter ID#: 9, 13, 16, 18, 22, 24, 30, 61, 63, 65, 66, 69)

Comment: We received 12 comments about the proposed youth turkey hunt on Mason Neck Refuge under alternative B. Nine comments were against youth turkey hunts or hunting turkeys in general. Several of the reasons cited included concern that turkeys were not abundant or overabundant on the refuge, they are not currently causing any habitat damage, there is not enough information on the population to warrant a hunt, and

conflicts with bald eagle protection. A representative comment states, “I urge USFWS not move forward with the plan to allow hunting wild turkeys on Mason Neck. I have seen very few turkeys since we moved to Mason Neck in 1987. Further, they are delightful to see but this is not very often and thus the population would not seem to indicate sufficiency to sustain a wild turkey hunt.”

Both the Northern Virginia Delta Waterfowl group and the VDGIF stated their support for a youth turkey hunt. The VDGIF indicates they were willing to work with refuge staff to help implement the hunt. However, they were concerned that limiting the hunt to only 10 youth hunters may be too conservative given the amount of interest in a youth deer hunt at Occoquan Bay Refuge and the unique nature of the program.

Response: As noted above under “**Hunting – General,**” hunting is mandated by Service policy and Federal law as a priority public use on national wildlife refuges if determined to be compatible with an individual refuge’s purposes. In addition, in 2010, the Secretary implemented his “Youth in the Great Outdoors Initiative” to promote youth programs in all Departmental agencies.

In our Introduction to this document on page 1, we clarify our proposal for the youth turkey hunt on Mason Neck Refuge described in the draft CCP/EA, objective 3.2. Our plan would be to open the refuge to a youth turkey hunt where a maximum of five youth per day would hunt for 3 days from sunrise to noontime during the State’s spring turkey hunting season. Only gobblers would be harvested and only by shotgun. Both our rationale for objective 3.2 and our compatibility determination for this activity would be edited in the final CCP to reflect this clarification. Our maximum of five youth per day is based on the amount of area we propose would be open for this activity and would not impact other refuge visitors.

Our proposal for a youth turkey hunt, including the analysis on the potential impacts on the local turkey population, was developed in partnership with VDGIF who have the best biological expertise and experience with implementing a program such as this in the region. They fully support this program, as noted in their comment, and we look forward to working with them, the National Wildlife Turkey Federation, and other partners to implement a successful and quality program.

Hunting – Deer

(Letter ID#: 15, 16, 22, 27, 30, 34, 57, 61, 69)

Comment: Most of the comments on this topic were in favor of controlling deer populations through public hunting opportunities. Several people favored adding a muzzleloader season and an archery season. One respondent was in favor of deer hunting, but did not want to see a sharpshooter program implemented because it would be costly, labor intensive, limited to only certain areas of the refuges, and negatively perceived by the local hunting community.

Response: As mentioned in our response above under “**Hunting – General,**” hunting is mandated by law and Service policy as a priority public use on national wildlife refuges, if determined to be compatible with an individual refuge’s purposes. In addition, hunting on Mason Neck Refuge controls the tremendous impact the local deer population is having on forest regeneration. During the CCP planning process, we evaluated the current hunting program on Mason Neck Refuge, including potential expansions of that program, as well as a potential new program on Featherstone Refuge. We believe we propose a program that is reasonable and feasible given existing and projected resources, and would improve an extremely popular activity on the refuge. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, alternative B, goal 3, objective 3.1 “Deer Hunting,” we describe some enhancements to the existing deer hunt program that include increasing the length of the shotgun season, increasing the number of hunters permitted, and providing an archery hunt. In chapter 3 for Featherstone Refuge, alternative B, goal 2, objective 2.2 “Hunting,” we detail our proposal to evaluate a potential hunt program when we have additional staff in place. This evaluation would require additional public involvement before making a decision.

We discussed using “sharpshooters” as one potential method of keeping the deer population in check, but have no specific plans to implement such a program, and it is not part of our final CCP. At any time, however, if the refuge manager determines that deteriorating resource conditions warrant it, for example, as a means to control CWD,

the manager could implement such a program as an administrative or management activity. We would work with USDA – Animal and Plant Health Inspection Services (APHIS), Wildlife Services wildlife damage experts or their contractors, VDGIF, and/or Fairfax County – Department of Public Safety to implement a sharpshooter program.

Hunting – Waterfowl and Hunting Blinds

(Letter ID#: 19, 24, 30, 61, 66, 69)

Comment: Four respondents commented on waterfowl hunting opportunities, and two others made specific recommendations on how hunting blinds could be managed.

In support of waterfowl hunting, we heard from the Northern Virginia Chapter of Delta Waterfowl, three of its members, and VDGIF. Delta Waterfowl specifically mentioned support for the use of public blind stakes and temporary floating blinds.

Delta Waterfowl also suggested a youth waterfowl hunting in Little Marsh on Mason Neck Refuge. They state, “While Objective 2.2 – Little Marsh Management in all Alternatives proposes to continue prohibiting public access to Little Marsh, [the Northern Virginia Chapter of Delta Waterfowl] would like FWS to consider a youth waterfowl hunt in Little Marsh on the youth waterfowl hunt day determined by [V]DGIF. Because this area is already closed, there would be no conflicts with other uses. Additionally, the waterfowl hunting season occurs in fall and winter; thus would have no affect on the heron rookery. Little Marsh would provide a great opportunity for youth to have a successful waterfowl hunt, which would in turn help get youth involved in waterfowl hunting in Virginia. According to the 2010 [V]DGIF Waterfowl Hunter Survey, the average age of the Virginia waterfowler is increasing and is currently 47 years old. This increase indicates a lack of youth recruitment...”

We also heard from two people in opposition to waterfowl hunting on the refuges. One person thought there were already enough waterfowl hunting opportunities in the area and that the blinds currently available are underutilized. The other person was concerned because he has observed abandoned hunting blinds elsewhere in the area, and felt that the blinds and associated debris and litter are an “eyesore.”

Another person also felt that there was adequate waterfowl hunting opportunities in the area, and that the refuge’s limited resources should not be wasted on adding public stake blinds. This person was also concerned that the addition of public stake blinds may create a potential conflict with the non-hunting public. That respondent also wrote specifically about temporary floating blinds,

The use of temporary floating blinds is another concern proposed in Alternatives B and C. It is not clear that an assessment of the existing (and ample) opportunity for the public to hunt waterfowl adjacent to Mason Neck [Refuge] and surrounding areas was made when selecting this aspect of Alternative B. Why use valuable resources when current opportunities exist? ... Approximately 4000 acres of water surface is currently available to support hunting from approximately 40 floating blinds simultaneously in Occoquan Reservoir (open to public no blind laws west of 95... It would seem that the resources necessary to manage, enforce, and administer a quality waterfowl hunting program outstrip any benefits this small net gain in public waterfowl hunting in this region would accomplish.

Response: First, we would like to be clear about what our draft CCP/EA states about waterfowl hunting. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, alternative B, goal 3, objective 3.3 “Waterfowl Hunting,” we state that waterfowl hunting in Mason Neck Refuge waters is not compatible with the purposes of this refuge and we continue to stand by this determination. This includes the decision to continue to prohibit waterfowl hunting in both Great and Little Marshes. However, we also recognize and fully support waterfowl hunting as a traditional and legitimate activity in the Potomac River and greater Chesapeake Bay region. Under objective 3.3, we would plan to fully support VDGIF in ensuring that the public has quality waterfowl hunting opportunities in those State waters near the refuge where it is currently allowed. As part of that cooperation, we identify a strategy under objective 3.3 to work with VDGIF to evaluate the use of temporary floating blinds to replace fixed blinds as a way to expand opportunities and reach more people. That being said, we have no jurisdiction or intent to mandate this recommendation, but merely offer it for consideration to VDGIF. We made no change to our recommendations in the final CCP.

In chapter 3 for Featherstone Refuge, alternative B, goal 2, objective 2.2 “Hunting,” we indicate the public and VDGIF interest in allowing hunting on this refuge. However, our proposal under objective 2.2 is to conduct a more detailed evaluation of possible hunting alternatives when we have additional staff in place, and include additional public involvement in that evaluation, before we develop a specific program. Considerations like those made in the comments above would be part of the analysis.

Fishing

(Letter ID#: 69, 55)

Comment: A few comments were in support of providing recreational fishing opportunities on Featherstone Refuge. One commenter emphasized that allowing a wildlife-dependent activity such as fishing will, “...increase the enjoyment and appreciation of the refuge resources to visitors and nearby residents.” The VDGIF is in favor of designating fishing sites on Featherstone Refuge, as proposed under alternative B. They expressed an interest in helping the refuge to manage the fishing program.

Response: We appreciate the support for our proposed recreational fishing program on Featherstone Refuge. Details on our recommendation are presented in the draft CCP/EA, in chapter 3 for Featherstone Refuge, under alternative B, goal 2, objective 2.3 “Recreational Fishing.” As described under objective 2.3, once the refuge is officially opened to public use and access, we would develop infrastructure at designated sites to facilitate fishing. These same recommendations are in the final CCP.

Dog Walking

(Letter ID#: 8)

Comment: One respondent stated that dog walking should be allowed on the refuges, but that refuge staff should strictly enforce that dogs remain on a leash and owners pick up their pets waste.

Response: We agree with the comment. We edited our finding of appropriateness and compatibility determination on dog walking in appendix B of the final CCP to make it more explicit that visitors walking dogs are required to keep their dog on a maximum 10-foot leash and are required to pick up all waste left by their dogs.

Opening Featherstone Refuge to Public Access

(Letter ID#: 10, 12, 13, 14, 15, 17, 18, 24, 25, 30, 47, 50, 52, 53, 54, 55, 56, 57, 60, 61, 67, 69, 70, 73, 74, 78)

Comment: Comments included both support for and against opening Featherstone Refuge to public use and access.

Most people who responded want to see the refuge opened for public access and recreation. Many of these people want the refuge opened immediately upon CCP approval. However, some people in favor of opening the refuge also want safeguards put in place to protect natural resources from visitor impacts (e.g., low impact trail locations). A few other people in support of opening the refuge in the long term want the Service to delay that opening until biological inventories are completed and we know where sensitive areas are (e.g., rare plant communities, vernal pools, or wildlife nesting or breeding sites) in proximity to proposed access and trails. A few others who want the refuge opened expressed concern with providing safe access. Some offered suggestions as to potential access points. Several others point out that, although the refuge is currently closed, trespass and other illegal activities are continuing to occur and are a challenge to control, and in their opinion, officially opening the refuge to public access would afford more control over inappropriate activities.

The following are representative quotes in support of opening Featherstone Refuge to public access.

Prince William County wrote, “Providing a recreational amenity in the community will allow citizens to enjoy a healthier lifestyle by creating an enhanced walkable community. By opening up the Refuge, we can also further our research and understanding of the wildlife. Prince William County has many hidden treasures in the Refuge, and it is a shame that we do not have access. By better utilizing our volunteer conservation resources, we can reduce federal budget needs. I urge you implement a time line that will lead to the opening of the Refuge in 2011.”

The VDGIF wrote, “We support the development of safe public access to Featherstone. VDGIF recognizes the substantial barriers that currently exist to providing access and will assist the USFWS in addressing those barriers where appropriate. Adequate, safe public access to Featherstone is necessary to provide valuable fishing, hunting, education, and wildlife viewing programs. Once access has been established, VDGIF is willing to work closely with the USFWS to implement these programs at Featherstone.”

Another person wrote: “... I would like to state that based on my 19 years of experience managing public lands in Northern Virginia that even though the refuge is officially closed, it is not really closed, and the people who are going there are making management decisions in the absence of guidance from staff. Since the site is active, it is better to open it to the public and guide the use of the site through appropriate location of trails and types of allowed activities.”

Another person wrote, “...I do not think staff increases are necessarily needed to make Featherstone [Refuge] more accessible to the public. Forty years is a very long time for planning public use of this refuge unit. While such uses certainly should be subject to reasonable limitations – protection of known sensitive wildlife areas, periodic closures for breeding birds, etc. – there are pathways at present and areas of lesser sensitivity that can offer visitors insight into Featherstone’s unique riparian ecosystem. With minimal infrastructure improvements this unit could and should be made accessible to the public for prescribed uses that assure protection of its special natural character.”

A few people recommended we allow non-motorized boat access to the refuge. At one of our public meetings, an official advisor to Congressman Connolly read a letter from the Congressman to Assistant Secretary of Interior Thomas Strickland. The letter conveyed the Congressman’s support for opening the refuge immediately to public use and access and included a specific recommendation to allow non-motorized boat access from the shore of the refuge on a section of sandy beach. In their opinion, this would afford another means of access to the refuge and would not be a disturbance to wildlife. The Congressman states, “Access to trails and low impact boat landings would offer public access in a manner consistent with wildlife conservation.” Another person commented, “I don’t see any consideration for access to the refuges for kayakers or canoe enthusiasts, despite being adjacent to the Occoquan Water Trail and Leesylvania and Mason Neck State Parks. I request that a landing area be added to the public use options for both refuges. These could be seasonal if not year round and would boost ecotourism and environmental education.”

Several commenters did not wish to see the refuge opened to the public primarily because they felt it would negatively impact the refuge’s natural resources. The following are representative quotes regarding maintaining a closure to public access on Featherstone Refuge.

One respondent who felt vegetative and wildlife surveys were needed wrote, “We don’t really know what’s on Featherstone [Refuge]...Opening Featherstone [Refuge] to the general public, hunters, and fisherman will permanently alter this ecosystem. Experience tells us that the refuge will slowly be developed to accommodate uses by the public over time. Those species that we know nothing about may simply disappear before we get to them.”

Another person wrote, “The introduction of roads, trails, and human accommodation disrupts vernal pools (which are dry and not obvious most of the year. They are often unknowingly bisected or their water retention properties are destroyed) and the natural migration paths that amphibians (new trails, roads, and paths often disrupt these routes as migration paths simply aren’t known) follow to get to these pools to breed. Simply put, we really don’t know or understand the natural ecosystems which we desire to disrupt...It is important that we maintain some “wild spaces” free from all human disruption with the exception of managed research to learn more about the ecosystem and the creatures that inhabit that ecosystem. While it sounds well intended to open Featherstone, we know that once humans are introduced into a natural environment, damage will occur... We really don’t know the impact of doing something as simple as running a bush hog around a property to create paths will have on the environment and those organisms it hosts. Despite the best intentions, we know that environmental hazards will be introduced and the environment will suffer. This is a pragmatic assessment. “We” (people”) tend to do more harm than good when we start tramping around “wild spaces.”

Another respondent wrote: “The issue of Featherstone [Refuge] opening has become politicized, which is unfortunate. As the Service noted, there is currently no parking or safe public access. I believe that at the minimum, that must be identified & funded before even entertaining opening. Equally important, there simply isn’t enough known about the site to consider opening even if the parking/access issue was resolved. On the surface it appears FWS is being pressured to open because “it is public land and the public should have access.” Well, maybe yes and maybe no, but certainly not yet (and maybe not ever). Natural resource surveys, wetland mapping, and hydrology identification needs to be completed; safe access and parking need to be identified and brokered as well. While Option B states provisos to be in place before opening, I think that is a very slippery slope. On one hand, it might deflect criticism from FWS since the provisions to opening are not funded and complaints can be deflected. But I think you will find it to be the opposite and FWS will face unfair pressure to get it open somehow, potentially with resources that are desperately needed at Occoquan Bay & Mason Neck [Refuges]. In no way should we ever get into this type of rob Peter to pay Paul scenario, especially when 1) the two sister refuges in the Complex are not being managed in accordance to its CCP’s due to lack of funding and staffing levels and 2) there really isn’t a huge need to open Featherstone at this time; Occoquan Bay is literally 1 mile away as the eagle flies. There is no compelling reason to open Featherstone to the public, except to cave in to political and public pressure.”

Response: The proposal to open Featherstone Refuge to public use and access received the most comments of any category for either refuge. We appreciate and respect the various opinions and heartfelt expressions on whether or not to open the refuge. We seriously considered each comment and weighed it against our original proposal and analysis before developing the following final recommendation.

We believe our analysis in the draft CCP/EA under alternative B is still valid and relevant in support of opening Featherstone Refuge to public use and access once public parking and safe access across the railroad tracks is secured. We continue to work with Prince William County officials and other stakeholders in pursuit of viable overland access options as we indicated in the draft CCP/EA under Featherstone Refuge alternative B, goal 2, objective 2.1 “Public Access.” However, after careful consideration of public comments, we propose the following modifications to that proposal.

- We have scheduled a survey on the refuge in partnership with the VNPS to locate and map any rare plant communities in proximity to proposed trail corridors. We would adjust trail locations or modify trail designs as warranted to minimize impacts, and would enlist the assistance of these partners in monitoring use and impacts over the long term.
- We will work in partnership with VDGIF and VNHP to locate and map any sensitive wildlife or plant areas in proximity to proposed trail corridors. We would adjust trail locations, modify trail designs, or implement seasonal closures as warranted to minimize impacts, and would enlist the assistance of these partners in monitoring use and impacts over the long term.
- As detailed in our “**Introduction**” to this appendix on page 1, immediately upon CCP approval, we propose to allow non-motorized boat landings on tidal beach at one location on Farm Creek (refer to map 4.3 in the final CCP) to facilitate wildlife observation and photography. This landing site corresponds with our proposed location of the southernmost observation deck and fishing platform that we presented in the draft CCP/EA. Visitors accessing the refuge at this location by non-motorized boat would be allowed to walk approximately 0.4 miles between points A and B on the existing footpath. Boaters would be confined to this section of footpath until the rest of the refuge is officially open to public use. Recreational fishing would not be allowed from this location until all administrative procedures are completed as described in the draft CCP/EA under Featherstone Refuge alternative B, goal 2, objective 2.3 “Recreational Fishing.”

Alternatives

Service-preferred Alternatives – General

(Letter ID#: 2, 4, 7, 13, 28, 31, 48, 51, 69)

Comment: Ten commenters expressed favorable comments about the Service-preferred alternatives for both Mason Neck and Featherstone Refuges. Specific reasons for support included the proposed cultural resources conservation and interpretation, protection and enhancement of tidal marsh and forest habitat on Mason Neck Refuge, protection of sensitive wetlands on Featherstone Refuge, public use opportunities, and habitat management for bald eagles, great blue herons, and other migratory birds.

Response: We appreciate the support of our preferred alternatives. All of the actions mentioned by respondents are included in our final CCP.

Alternative B – Mason Neck Refuge

(Letter ID#: 9, 29, 30, 71)

Comment: Five people stated they preferred Alternative B specifically for Mason Neck. Specific reasons cited included the proposed conservation of migratory birds and other native wildlife, increasing shoreline protection, accessing integrity of biological resources, and increasing outreach and partnership efforts. However, two of these commenters specifically mentioned supporting alternative B “without the youth turkey hunt.”

Response: Again, we appreciate the support of our Service-preferred alternative. All of the actions mentioned by respondents are included in our final CCP. Please see our response above under “**Hunting – Turkey**” regarding other public comments and our response on the proposed youth turkey hunt.

Alternative C – Mason Neck Refuge

(Letter ID#: 3, 16, 22)

Comment: Several people commented that they preferred alternative C for Mason Neck Refuge because of its proposal to further expand public access. For example, one person wrote, “In the populous northern Virginia, public lands have been rightly preserved, however has also unjustly limited non-intrusive public opportunities within the refuges that have been set up. This leads to fewer opportunities for citizens to enjoy the environment in its more natural settings without having to drive long distances for these experiences...there needs to be more public opportunity within these public resources.”

Response: We appreciate the interest in expanding public use opportunities on Mason Neck Refuge. In the draft CCP/EA, chapter 3 for Mason Neck Refuge, under alternative B goal 3, objectives 3.1 to 3.6, we outline a variety of improvements and additions to our current public use program on that refuge. Proposed actions under alternative C expand programs further than alternative B in terms of the number and diversity of programs, and would result in more infrastructure than alternative B. We believe that the public use opportunities we propose under alternative B represent the most reasonable and feasible set of actions given predicted resource impacts and our projected levels of funding and staffing. In summary, and based on our professional opinion, alternative B represents the most balanced approach to conserving and protecting native fish, wildlife, and vegetation, while still providing the American public with a variety of high-quality, wildlife-dependent public use opportunities on Mason Neck Refuge.

Alternative A – Featherstone Refuge

(Letter ID#: 24, 25)

Comment: Two people favored alternative A for Featherstone Refuge, which would keep the refuge closed to the public. Both expressed concern over moving too swiftly to open the refuge. One respondent wrote “I support ... continuing our current management of Featherstone Refuge for the next 15 years. [Alternative] A allows for research to be conducted on a case by case basis. While Government is always pressed to “do something,” this is not always the prudent decision. In the case of the Featherstone National Wildlife Refuge, there is no compelling reason to open one of the few remaining wild spaces to the public. Let’s let nature take its course until we understand it a bit better. We really don’t know what the environmental impact and damage will be by allowing more access and activity on Featherstone or any other refuge. I believe continuing to leave this “wild space” alone is a good investment in Prince William County, Virginia and the Nation’s future. Moving slowly based upon the results of citizen science and sound research is the prudent path. Nature is running out of room... let’s give it a break.”

Response: Our response above under “**Opening Featherstone Refuge to Public Access**” explains our rationale for recommending that the refuge be open to public access, what precedent actions would need to take place before opening the refuge, and the measures we would take to conserve and protect resources.

Alternative B – Featherstone Refuge

(Letter ID#: 3, 7, 8, 12, 17, 20, 50, 54, 57, 77, 78)

Comment: Ten respondents favored alternative B for Featherstone Refuge, as they felt it was a measured approach to opening the refuge. Prince William County wrote of the, “existing policies in Prince William County’s comprehensive plan support Alternative B. The plan identifies the need for parks accessible to the general public, and by opening the refuge to the public, it would contribute to the broad variety of park lands already available to county residents. The plan encourages the establishment of corridors that connect open spaces and recommends the construction of a comprehensive network of trails. Alternative B would be consistent with the county’s goal of having the Potomac Heritage National Scenic Trail open for the use and enjoyment of county residents. The county further supports the actions including coordinating with partners, that would be undertaken regardless of which alternative is selected.”

The local elected representative for the Woodbridge District on the County Board of Supervisors urged the Service, “to quickly implement Alternative B in order to open up the refuge to pedestrian access. It is unfortunate that the residents cannot enjoy the wonders of wildlife that reside in their own backyard. Opening up the refuge will serve to further connect the Potomac Heritage National Scenic Trail to the Mason Neck and Occoquan national wildlife refuges. Providing a recreational amenity in the community will allow citizens to enjoy a healthier lifestyle by creating an enhanced walkable community. By opening up the refuge, citizens can also further their research and understanding of the wildlife. Prince William County has many hidden treasures in the refuge. By better utilizing volunteer conservation resources, federal budget needs can be reduced. The FWS is urged to implement a timeline that will lead to the opening of the refuge in 2011.”

An individual commenter wrote, “I have lived in Prince William County for 32 years. Since Occoquan Bay Wildlife Refuge opened, I have enjoyed hundreds of hikes there, seeing numerous birds, butterflies, dragonflies, mammals, snakes, etc. I’d like the opportunity to do the same at Featherstone National Wildlife Refuge. I have visited Featherstone twice with special permit groups, and think it’s a lovely place. I support Alternative B, and think that the refuge should be opened to the public as soon as possible. The trails seem adequate for use now. I also would like to see an effort to catalog the plant species in the very near future.”

Response: Our response above under “**Opening Featherstone Refuge to Public Access**” explains our rationale for recommending that the refuge be open to public access, what precedent actions would need to take place before opening the refuge, and the measures we would take to conserve and protect resources.

Cumulative Effects

(Letter ID#: 13)

Comment: One letter stated, “We applaud your attention to cumulative impacts of increased visitor use and development. We urge you to factor into this impacts by other federal agencies and state and local governments in the nearby areas. For example, the anticipated addition of thousands of new jobs at Fort Belvoir’s Main Post could significantly increase traffic and congestion on U. S. 1, which could further degrade the area’s air quality.”

Response: We note the comment above, but contend that our analysis of direct, indirect, and cumulative impacts on air quality and other resources in the draft CCP/EA, chapter 4, is sufficient to make a determination on the proposed action. In addition, we believe the projected hiring at Fort Belvoir does not relate to the proposed action and the purpose of, and need for, a CCP as stated in chapter 1. In summary, we believe the job forecast at Fort Belvoir and its impact on the region is outside the scope of our analysis.

Comment: A comment from the Fairfax County SWPD expressed concern with George Mason University’s proposed ICAR [International Conflict and Resolution] Center near Mason Neck State Park and its impact on water quality. Their comment included the following, “SWPD staff are concerned about George Mason University’s proposed ICAR center at the mouth of Thompsons Creek, near the Mason Neck State Park boundary, and the potential impacts to both the state park and the refuge. The university plans to install a sewage treatment system which will discharge wastewater into Thompson Creek at its confluence with Belmont Bay. It appears that, in spite of the requirements for LOT (Limit of Technology) to meet the Chesapeake Bay [Total Maximum Daily Load] TMDL goals, the proposed wastewater treatment facility will not be held to the same or higher discharge standards as discharges from the nearby Norman M. Cole Pollution Control Plant.

The Fairfax County Board of Supervisors recently approved a Watershed Management Plan (WMP) for the combined watersheds of the Lower Occoquan, including the Mill Branch, Kane Creek and High Point watersheds. The lower Occoquan WMP contains several proposed stream restoration projects in the headwaters of Mill Branch and Thompsons Creek which transect the Meadowood Special Recreation Management Area, as well as in the headwaters of Kane Creek which flows through both Mason Neck State Park and the refuge. A buffer restoration project is also proposed in the High Point watershed near Gunston Hall. The SWPD would welcome the opportunity to share its findings and discuss the proposed projects with FWS and its Mason Neck Managers Group partners.”

Response: We consider the comment about the George Mason University facility outside the scope of the CCP because it does not relate to the proposed action or the purpose of, or need for, a CCP as stated in chapter 1. However, the refuge manager will present the comment and concerns to the Mason Neck Managers Group for discussion at their next meeting, along with the suggestion that the manager’s group meet with the Fairfax County SWPD for an update.

With regard to the second comment, we appreciate the update on Fairfax County’s WMP and the proposed restoration projects in the vicinity of Mason Neck Refuge. The suggestion that the county’s SWPD meet with the managers group is also a good idea. Similar to our commitment about the George Mason University facility, the refuge manager will bring the idea of a meeting with the Fairfax County SWPD to the managers group to discuss stream restoration proposals.

Attachment 1—Letter ID Numbers and Respondents

Letter ID Number	Name
1	Kendrick Terry
2	Deanna Beacham – Virginia Council on Indians
3	Scott Helberg
4	Ethel Eaton – Virginia Department of Historic Resources
5, 16, 64	Mary Jane Reyes
6, 63	Thomas E. Kennedy
7	Ellie Irons – Virginia Department of Environmental Quality (consolidated response from multiple State agencies)
8	Nancy Wolf
9 (see 10)	Rob Hartwell
10	Kim Hosen – Prince William Conservation Alliance Rob Hartwell – Elizabeth Hartwell Environmental Education Fund Larry Meade – Northern Virginia Bird Club Steven Bruckner – Sierra Club, Virginia Chapter Stella Koch – Virginia Conservation Associate Audubon Naturalist Society
11, 62	Joseph Chudzik
12	Nancy Vehrs
13	Glenda Booth and Bruce Johnson – Audubon Society of Northern Virginia
14	Sally Anderson – Virginia Native Plant Society
15 (see 57)	Charles Smith – Prince William Wildflower Society
17, 25, 46	Alan Alborn
18, 40, 48, 67	James Waggener
19	Eric Peterson
20	James Gallagher
21	Teddy Carr
22	Mike Smith
23	Kevin Black
24	Bob Studholme
26	Diane Behm
27	Wanlace Yates
28	Craig Boke
29	Michael Finazzo
30, 35, 61	Jeff Browning – Northern Virginia Chapter of Delta Waterfowl
31	Eric Lipp
32	Richard Strauss
33	Jill Miller – Audubon Society of Northern Virginia
34	Jean Public

Service Responses to Comments by Subject

36	Deborah Westbrooke
37	B. Sachau
38	Reverend Roger W. Verley
39 (see 13)	Glenda Booth – Audubon Society of Northern Virginia
41	Ken and Betty Hagedorn
42	Russell Davenport
43	Gerald Lyons
44 (see 10)	Kim Hosen – Prince William Conservation Alliance
45	Greg Lennon
47	Kevin Parker
49	Cheryl Saggars
50	Larry Underwood
51	Linda Johnston – Friends of the Potomac River Refuges
52	Charlie Grymes – Prince William Conservation Alliance
53	Joan Patterson
54	Judy Gallagher – Prince William Conservation Alliance
55	David Brickley
56, 73	Dorothy Estep
57 (see 15)	Charles Smith – Virginia Plant Society
58	Diana Rock
59	Harry Ragon
60	Collin Davenport – Staffer for U.S. Representative Gerald E. Connolly
65	Faith Chudzik
66	Chris Schreiner
68	Mark Crain – Northern Virginia Chapter of Delta Waterfowl
69	Robert Duncan – Virginia Department of Game and Inland Fisheries
70	Gerald E. Connolly, U.S. House of Representatives
71	LeAnn Astinon – Fairfax County Stormwater Planning Division
72	William Litner
74	Jesse R. Baldwin
75	Mary Ann Lawler
76	Donald E. Briggs – Potomac National Scenic Trail, National Park Service
77, 78	Frank J. Principi – County of Prince William
79	Fred Selden – County of Fairfax

Citations

- Bureau of Land Management (BLM). 2010. NEPA Web Guide: Examples of Substantive Comments. Accessed at http://www.blm.gov/wo/st/en/prog/planning/nepa/webguide/document_pages/6_9_2_1__examples.html on June 14, 2011.
- U.S. Postal Service (USPS). 2011. Zip Code Lookup. Accessed at http://zip4.usps.com/zip4/citytown_zip.jsp on June 14, 2011.
- U.S. Fish and Wildlife Service (USFWS). 1997. Occoquan Bay National Wildlife Refuge, Comprehensive Conservation Plan.
- Virginia Department of Game and Inland Fisheries (VDGIF). 2001. Personal communication with Greg Weiler.